2/19/2814 14:56 2143821487 Complaint Issued 03/31/1 Postcondaint Bilateral Set SECOND	RC 13 15 CC Hleme ANG	DALLAS DANGE Unitiated on the Compliance Unitiated Compliance Unitiated Compliance Unitiated United	# 02/81/15 Deted 1/30/15
CHARGE AGAINST A LABOR ORGANIZ.		FOR FLRA USE ONLY Case No. DA - CO - 15-0012 Date Filed 12-19-14)
1. Charged Labor Organization Name: AFGE, Local 2437 Address: 4500 South Lancaster Road, Dallas, Texps 75215 Tol.#: (214) 857-0074 Ext. Fax#: 3. Charged Labor Organization Contact information Name: Donald Burrell Title: President, AFGE Local 2437 Address: 4500 South Lancaster Road, Dallas, Texas 75218 Tel.#: (214) 857-0074 Ext.	Name: De Address; 4: Tel.#. Fax#. 4. Chergin Name: Kei Title: Sta	p Party (Individual, Labor Organization, Activity, or Agen partment of Veterans Affairs (02) 500 South Lancaster Road, Dallias, Texas 75216 (214) 857-1656 Ext. (214) 302-1407 org Party Contact Information oneth S. Carroll (on behelf of Donald Kelly) off Attorney, DVA 500 South Lancaster Road (02), Dallas, Texas 75216 (214) 857-1656 Ext.	cy)

LEAKE (214) 302-1407 5. Which subsection(s) of 5 U.S.C. 7116(b) and/or (c) do you believe have been violated? [See reverse] 5 USC 7116(b)(5) *** 6. Tell exactly WHAT the labor organization did. Start with the DATE and LOCATION, state WHO was involved, including titles. This is filed as a ULP end a breach of settlement agreement by Domaid Kelly. Chief Negotiator for Veterans Affairs North Texas Health Care System: Veterans Integrated Service Network, Region 17: Veterans Canteen Service, Dallas, Texas: DVA Consolidated Mail Outpatient Pharmacy, Lancaster, Texas; and DVA Dallas-Fort Worth National Cometery. SEE ATTACHED --NOTE: THIS SECOND AMENDED COMPLAINT IS IDENTICAL TO THE AMENDED COMPLAINT DATED OCTOBER 8, 2014, EXCEPT FOR THE ADDITION OF NUMBERED PARAGRAPH 4 ON THE ATTACHMENT. 7. Have you or snyone else raised this matter in any other procedure? No If yes, where? [see reverse] B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT. 18 U.S.C. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX #3 BY [Check "x" box] | Fax | 1st Class Mail | in Person Donald Kelly 12/19/2014 Type or Print Your Name Your Signature

FLRA FORM 23 (Rav. 1/89)

2143021407

- Based upon an unfair labor practices (ULP) complaint filed by the Agency, on May 30. 2013, the Federal Labor Relations Authority (FLRA) gave notice of filing a ULP complaint against the Union for falling and refusing to bargain a "supplemental local agreement" (SLA) to the Master Agreement between the Department of Veterans Affairs and the American Federation of Government Employees (2011). One of the bases of the complaint was a series of statements by the Union president, Donald Burrell (Burrell), that he would delay any such negotiations and/or completion of such negotiations. The Agency and the Union entered into a settlement of that complaint (Settlement), signed June 26, 2013, in which the Union agreed to negotiate in good faith and further that "it will not unnecessarily delay negotiations." The parties thereafter began negotiations for ground rules (GR).
- After signing the Settlement, the parties engaged in GR negotiations, during which the Union, through Gary Martinez (Martinez), the Union's Chief Negotiator, Burrell, and Gerald Goodwin (Goodwin), the Union's Vice-President engaged in a breach of the settlement and unfair labor practices by refusing to honor the settlement. As a result, the Agency filed a second ULP. No complaint was filed by the FLRA on that complaint, because of a second settlement negotiated as indicated below. That settlement, however, resulted from the Agency's decision to forge forward with SLA negotiations rather than to permit the Union to continue to delay those negotiations pending a trial of the ULP complaint.
- On March 27, 2014, the parties signed an impasse settlement agreement (ISA) which resolved the remaining issues for signing GR. The signatories of the ISA were the Chief Negotiators, Kenneth Carroll (Carroll) for the Agency and Martinez for the Union. The mediation for the ISA was conducted by a member of the Federal Services Impasse Panel. Notwithstanding the finalization of all provisions of the GR, the Union delayed signing the final GR and further engaged in delaying tactics and bad faith bargaining by the following conduct:

On April 3, 2014, Carroll sent Martinez an email requesting a meeting to sign the GR. Martinez responded on April 7, 2014, that he would "call . . . tomorrow for preparation of signing the [GR]." Thereafter, Carroll and Martinez signed the GR on April 10, 2014. Pursuant to Article 3 of the GR, the Chief Negotiators are given full authority to sign on any and all agreements between the parties. Further, pursuant to Article 10 of the GR, the parties are required to exchange SLA proposals no later than 60 days after the signing of the GR and to meet to negotiate no later than 120 days after the signing of the GR. Notwithstanding those provisions, on April 10, 2014, Goodwin advised that the GR were "not effective until all parties have signed" and the Union went on to insist that the GR must be signed by Burrell. Burrell did not sign the GR until April 21, 2014, with the Union taking the position that the time limits stated above ran from that date, rather than April 10, 2014. The Union thus delayed negotiations of the SLA for 11 days. Based upon the date the union contended that the GR were "finally signed," SLA proposals were due no later than June 20, 2014. Although the Agency timely delivered its SLA proposals, the Union failed to deliver theirs until June 30, 2014, precipitating another 10-day delay in negotiations. Thereafter, the Union refused to agree to begin negotiations before August 24, 2014, 17 days after the required time for meeting as required by the GR.

The parties first began negotiating the SLA on August 25, 2014. Pursuant to Article 14 of the GR, the parties agreed that they "will provide a reasonable estimate on the anticipated length of [a] caucus and periodic updates if the original estimate needs to be shortened or lengthened." The parties further agreed "that the right to caucus shall not be used to unnecessarily delay negotiations or to prejudice the other party." From the very beginning and continuing throughout all negotiations with the Agency, the Union regularly arrived late at the negotiations, left early, and called caucuses in violation of the GR. Approximately % of all scheduled

negotiations involved the union arriving late, leaving early, or calling caucuses when the circumstances, both before and after, did not indicate such a need. Rarely, if ever, did the Union comply with the quoted provision of the GR regarding caucus updates and estimates.

Regularly, the Union has requested that employ ees be permitted to attend the negotiations as Union team members or alternates, despite the fact that such employees were not named as team members or alternates, and despite repeated requests from the Agency that the Union update their list of members and alternates. Indieed, without naming her as either a team member or alternate, in September 2014, the Union requested "official" time for Jerica Goodwin, a pharmacist and wife of Goodwin, to attend negotiations for September and three other scheduled sessions, a total of 20 days. Despite her not being listed, the Agency tentatively approved her for attendance on 19 of the 20 days. The one day she was not approved was September 25, 2014, a day in which the Agency was unable to provide pharmacy coverage for her duties. Notwithstanding the fact that the GR do not require the Agency to release an employee to attend negotiations when patient care is at risk, the Union insisted that she be permitted to attend and thereafter, in bad faith, filed a ULP when the Agency declined that request. More particularly, (a) Jerica Goodwin called in "sick" on September 25, 2014, and thus would not have been at the negotiations in any event, and (b) the Union declared that the negotiations for September 25 (the date over which the ULP is filed) and September 26, 2014 were being suspended due to the Agency's declaration of "non-negotiability" regarding a Union proposal and the Union's intent to file a "negotiability determination" to the FLRA. See discussion below regarding the relevant GR section regarding such filings.

Pursuant to Article 21 of the GR, [u]nless mutually agreed by the parties, negotiation of other proposals will continue pending a negotiability determination by the FLRA." Despite that clear language, the Union initially contended that the cited provision did not permit further negotiations until after a negotiability determination by the FLRA, and the Union initially used that interpretation to justify their suspension of negotiations on September 25 and 26, 2014, and further to suspend all negotiations. Notwithstanding that initial stance, the Union thereafter agreed to continue negotiations at the scheduled October session. The Union has never explained, however, how it could have legally suspended negotiations for September 25 and 26, 2014.

Pursuant to Article 3 of the GR, Each party shall be represented at "the negotiations at all times by one duly authorized Chief Negotiator who is . . . authorized to sign off on agreements made by the parties." Pursuant to Article 18 of the GR, "at the end of each day, the Chief Negotiators will initial and/or sign off on the paper copy of all agreed sections or articles." Despite those provisions, Martinez has sometimes failed and refused to sign off on sections without first obtaining the permission of Burrell. That practice is a violation of Articles 3 and 18 of the GR.

4. Because of the union's conduct as described above, the parties have only had 3 ½ weekly sessions between August and December 2014. To meet the GR requirement of 18 sessions, the parties will have to meet 14 ½ weeks between January 2015 and July 2015, yet Martinez has advised the Agency that it is only willing to meet for 2 sessions in January and one session each in the months of February through June, but no sessions at all in July, a total of 7 sessions. According to that schedule, the parties will have only met 10 ½ times in one year, a total of 7 ½ times fewer than required by the GR. In response to a demand from Kelly that the Union honor the GR, Martinez responded by alleging Kelly was resorting to "this sort of BS." (See attached email string).

The Agency contends that the behavior described above is intentional and malicious, for the purpose of accomplishing Burrell's stated purpose of delaying or preventing the final negotiation of a SLA. Further, the Agency contends that the conduct as described above clearly reflects a complete disregard for the law, the FLRA and any concept of good faith bargaining. For the reasons stated, the Agency requests that a ULP complaint be issued by the FLRA and that the FLRA issue an order (1) barring Martinez, Burrell, and/or Goodwin from participating in any union activity whatsoever, or alternatively, (2) barring Martinez, Burrell, and/or Goodwin from participating in any way with the negotiation of the SLA, or alternatively (3) issuing any other appropriate order, including the requirement of a mediator/observer from the Federal Mediation and Conciliation Service whose normal fees are to be paid solely by the Union.



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

Case No.

CHARGE AGAINST A LABOR ORGANIZATION

Date Filed

FOR FLRA USE ONLY

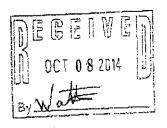
Complete instructions are on the back of this form. 1. Charged Labor Organization 2. Charging Party (Individual, Labor Organization, Activity, or Agency) Name: AFGE, Local 2437 Name: Department of Veterans Affairs (02) Address: 4500 South Lancaster Road, Dallas, Texas 75216 Address: 4500 South Lancaster Road, Dallas, Taxas 75216 Tel#: (214) 857-0074 Tet.#: (214) 857-1658 (214) 302-1407 Ext Fax#: Fax#: 3. Charged Labor Organization Contact information 4. Charging Party Contact Information Name: Donald Burrell Name: Kenneth S. Carroll (on behalf of Donald Kelly) Title: President, AFGE Local 2437 TIUE: Staff Attorney, DVA Address: 4500 South Lancaster Road, Dallas, Taxas 75216 Acidress: 4500 South Lancaster Road (02), Dallas, Texas 75216 Tel.#: (214) 857-0074 EXL (214) 857-1656 (214) 302-1407 Tet.#: Ext. Fax#: Fax#

5. Which subsection(s) of 5 U.S.C. 7116(b) and/or (c) do you believe have been violated? [See reverse] 5 USC 7116(b)(5) ***

6. Tell exactly WHAT the labor organization did. Start with the DATE and LOCATION, state WHO was involved, including titles.

*** This is filed as a ULP and a breach of settlement agreement by Donald Kelly, Chief Negotiator for Veterans Affairs North Texas Health Care System; Veterans Integrated Service Network, Region 17; Veterans Canteen Service, Dallas, Texas; DVA Consolidated Mail Outpatient Pharmacy, Lancaster, Texas; and DVA Dallas-Fort Worth National Cemelery.

SEE ATTACHED



7. Have you or anyone else raised this matter in any o	other procedure?NoX Yes	If yes, where? [see reverse]
8. I DECLARE THAT I HAVE READ THIS CHARG BELIEF. I UNDERSTAND THAT MAKING WILLFUL 1001. THIS CHARGE WAS SERVED ON THE PERSON Commercial Delivery Certified Mail	LY FALSE STATEMENTS CAN BE DUNIEL	E TRUE TO THE BEST OF MY KNOWLEDGE AND HED BY FINE AND IMPRISONMENT, 18 U.S.C. Fax 1st Class Mail 1 In Person
Donald Kelly, SPHR	Could Kell	10/02/2014

- 1. Based upon an unfair labor practices (ULP) complaint filed by the Agency on May 30, 2013, the Federal Labor Relations Authority (FLRA) gave notice of filing a ULP complaint against the Union for failing and refusing to bargain a "supplemental local agreement" (SLA) to the Master Agreement between the Department of Veterans Affairs and the American Federation of Government Employees (2011). One of the bases of the complaint was a series of statements by the Union president, Donald Burrell (Burrell), that he would delay any such negotiations and/or completion of such negotiations for up to ten years. The Agency and the Union entered into a settlement of that complaint (Settlement), signed June 26, 2013, in which the Union agreed to negotiate in good faith and further that "it will not unnecessarily delay negotiations." The parties thereafter began negotiations for ground rules (GR).
- 2. After signing the Settlement, the parties engaged in GR negotiations, during which the Union, through Gary Martinez (Martinez), the Union's Chief Negotiator, Burrell, and Gerald Goodwin (Goodwin), the Union's Vice-President, engaged in a breach of the settlement and unfair labor practices by refusing to honor the settlement. As a result, the Agency filed a second ULP. No complaint was filed by the FLRA on that complaint, because of a second settlement negotiated as indicated below. That settlement, however, resulted from the Agency's decision to forge forward with SLA negotiations rather than to permit the Union to continue to delay those negotiations pending a trial of the second ULP complaint.
- 3. On March 27, 2014, the parties signed an impasse settlement agreement (ISA) which resolved the remaining issues for signing GR. The signatories of the ISA were the Chief Negotiators, Kenneth Carroll (Carroll) for the Agency and Martinez for the Union. The mediation for the ISA was conducted by a member of the Federal Services Impasse Panel. Notwithstanding the finalization of all provisions of the GR, the Union delayed signing the final GR and further engaged in delaying tactics and bad faith bargaining by the following conduct:

On April 3, 2014, Carroll sent Martinez an email requesting a meeting to sign the GR. Martinez responded on April 7, 2014, that he would "call . . . tomorrow for preparation of signing the [GR]." Thereafter, Carroll and Martinez signed the GR on April 10, 2014. Pursuant to Article 3 of the GR, the Chief Negotiators are given full authority to sign any and all agreements between the parties. Further, pursuant to Article 10 of the GR, the parties are required to exchange SLA proposals no later than 60 days after the signing of the GR and to meet to negotiate no later than 120 days after the signing of the GR. Notwithstanding those provisions, on April 10, 2014, Goodwin advised that the GR were "not effective until all parties have signed" and the Union went on to insist that the GR must be signed by Burrell. Burrell did not sign the GR until April 21, 2014, with the Union taking the position that the time limits stated above ran from that date, rather than April 10, 2014. The Union thus delayed negotiations of the SLA for 11 days. Based upon the date the union contended that the GR were "finally signed," SLA proposals were due no later than June 20, 2014. Although the Agency timely delivered its SLA proposals, the Union failed to deliver theirs until June 30, 2014, precipitating another 10-day delay in negotiations. Thereafter, the Union refused to agree to begin negotiations before August 24, 2014, 17 days after the required time for meeting as required by the GR.

The parties first began negotiating the SLA on August 25, 2014. Pursuant to Article 14 of the GR, the parties agreed that they "will provide a reasonable estimate on the anticipated length of [a] caucus and periodic updates if the original estimate needs to be shortened or lengthened." The parties further agreed "that the right to caucus shall not be used to unnecessarily delay negotiations or to prejudice the other party." From the very beginning and continuing

throughout all negotiations with the Agency, the Union regularly arrived late at the negotiations, left early, and called caucuses in violation of the GR. Approximately % of all scheduled negotiations involved the union arriving late, leaving early, or calling caucuses when the circumstances, both before and after, did not indicate such a need. Rarely, if ever, did the Union comply with the quoted provision of the GR regarding caucus updates and estimates. Moreover, during negotiating sessions that began the week of September 22, 2014, held in Arlington, Texas, the Union left the negotiations in violation of the Ground Rules, once to "get ahead of traffic" and another time to caucus at a location not agreed upon by the parties, at the VA hospital in Dallas, Texas. Pursuant to Article 14 of the GR, the parties must caucus in an agreed upon caucus room. Despite that requirement, Martinez responded to a complaint by Kelly in an October email, "what difference or concern [did it make] to the agency where the caucuses [were] held and why?"

Regularly, the Union has requested that employees be permitted to attend the negotiations as Union team members or alternates, despite the fact that such employees were not named as team members or alternates, and despite repeated requests from the Agency that the Union update their list of members and alternates. Indeed, without naming her as either a team member or alternate, in September 2014, the Union requested "official" time for Jerica Goodwin, a pharmacist and wife of Goodwin, to attend negotiations for September and three other scheduled sessions, a total of 20 days. Despite her not being listed, the Agency tentatively approved her for attendance on 19 of the 20 days. The one day she was not approved was September 25, 2014, a day in which the Agency was unable to provide pharmacy coverage for her duties. Notwithstanding the fact that the GR do not require the Agency to release an employee to attend negotiations when patient care is at risk, the Union insisted that she be permitted to attend and thereafter, in bad faith, filed a ULP when the Agency declined that request. More particularly, (a) Jerica Goodwin called in "sick" on September 25, 2014, and thus would not have been at the negotiations in any event, and (b) the Union declared that the negotiations for September 25 (the date over which the ULP is filed) and September 26, 2014 were being suspended due to the Agency's declaration of "non-negotiability" regarding a Union proposal and the Union's intent to file a "negotiability determination" to the FLRA. See discussion below regarding the relevant GR section regarding such filings.

Pursuant to Article 21 of the GR, [u]nless mutually agreed by the parties, negotiation of other proposals will continue pending a negotiability determination by the FLRA." Despite that clear language, the Union initially contended that the cited provision did not permit further negotiations until after a negotiability determination by the FLRA, and the Union initially used that interpretation to justify their suspension of negotiations on September 25 and 26, 2014, and further to suspend all negotiations. Notwithstanding that initial stance, after business hours on September 26, 2014, Martinez advised that the Union would continue negotiations at the scheduled October session. The Union has never explained, however, how it could have legally suspended negotiations for September 25 and 26, 2014.

After agreeing on September 26 to reappear at the negotiations, on or about October 2, 2014, Martinez advised that the Union would not appear for negotiations the week of October 6, on the grounds that the Agency had unilaterally changed the location of the negotiations from Arlington, Texas, to the Dallas VA hospital. However, there was no agreement by the parties to continue negotiations in Arlington. Despite his statement, Martinez indicated in another email that the Union was willing to change the location back to the Dallas VA hospital, where all

negotiations on GR and the SLA have occurred, but only if the negotiations occurred in a room larger than the HR Conference Room, where all previous negotiations, including GR negotiations and the impasse mediation occurred. The Union then failed to appear for negotiations on October 6 or 7, 2014. Moreover, the Union failed to negotiate at all for a new location, despite an insistence that such was required by the GR. Kelly was advised by Martinez that Burrell would have to do such negotiations, but despite being invited to do so, Burrell failed wholly to respond or negotiate. Indeed, the week prior to the scheduled negotiations, Burrell scheduled other union business, a clear indication that he never intended to appear the week of October 6. Notwithstanding, (1) the GR specifically permits negotiations to occur at the VA hospital and nothing in the GR provides that the HR conference room is unacceptable or inadequate, (2) the Union has regularly looked to the Agency to provide space and has never made any attempt to negotiate or suggest other locations, (3) negotiations in Arlington met with several complaints by the Union as to equipment, (4) the VA hospital HR Conference Room was the place where all previous negotiations and impasse mediation had occurred, and (5) on October 7, 2014, Kelly notified the Union that he had secured a significantly larger conference room for October 8, 2014, but the Union failed to respond or appear for negotiations. The Agency contends that, coupled with the Union's initial suspension of the negotiations for a "negotiability issue"—a clear violations of the GR,-- the Union's decision to suspend negotiations over the location, and the Union's failure to appear at a larger conference room, indicates that their "suspension" of negotiations is another effort to continue to delay as long as possible the negotiation of a new SLA.

Pursuant to Article 3 of the GR, Each party shall be represented at "the negotiations at all times by one duly authorized Chief Negotiator who is . . . authorized to sign off on agreements made by the parties." Pursuant to Article 18 of the GR, "at the end of each day, the Chief Negotiators will initial and/or sign off on the paper copy of all agreed sections or articles." Despite those provisions, Martinez has sometimes failed and refused to sign off on sections without first obtaining the permission of Burrell. That practice is a violation of Articles 3 and 18 of the GR.

The Agency contends that the behavior described above is intentional and malicious, for the purpose of accomplishing Burrell's stated purpose of delaying or preventing the final negotiation of a SLA. Further, the Agency contends that the conduct as described above clearly reflects a complete disregard for the law, the FLRA and any concept of good faith bargaining. Indeed, Burrell has repeated several times that he would not honor settlement agreements he has made and that the FLRA cannot make him.

For the reasons stated, the Agency requests that a ULP complaint be issued by the FLRA and that the FLRA issue an order (1) declaring that the current supplement local agreement and all MOUs are null and void—the Union agreed during negotiations to include MOUs, and indeed has included proposals that cover existing MOUs,— and (2) requiring the Union to pay all Agency expenses incurred as a result of the Union's bad faith bargaining.



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY

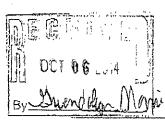
Case No. DA - CO - 15 - 00/0

CHARGE AGAINST A LABOR ORGANIZATION

te Filed OCT - # 2014

	udle rites UL1 - 45 2014
Complets instructions are on the back of this form.	
1. Charged Labor Organization	2. Che rging Party (Individual, Labor Organization, Activity, or Agency
Name: AFGE, Local 2437	Name: Department of Veterans Affairs (02)
Address: 4500 South Lancaster Road, Dallas, Texas 75218	Address: 4500 South Lancaster Road, Dallas, Texas 75216
Tel.#: (214) 857-0074 Ext.	Tel.#t (214) 857-1656 Ext.
Faxt.	Fax#: (214) 302-1407
3. Charged Labor Organization Contact Information	4. Charging Party Contact Information
Namo: Donald Burrell	Name: Kenneth S. Carroll (on behalf of Donald Kelly)
Title: President, AFGE Local 2437	Title: Staff Attorney, DVA
Address: 4500 South Lancester Road, Dallas, Texas 75216	Address: 4500 South Lancaster Road (02), Dallas, Toxas 75216
Tel#: (214) 857-0074 Ext. Fax#:	Tel#; (214) 857-1656 Ext. Feek; (214) 302-1407
5. Which subsection(s) of 5 U.S.C. 7116(b) and/or (c) do you believe har	ve been violented? [See reverse] 5 USC 7116(b)(5) ***
6. Tell exactly WHAT the labor organization did. Start with the DATE and *** This is filed as a ULP and a breach of settlement agreement Health Care System; Veterans Integrated Service Network, Re Mail Outpatient Pharmacy, Lancaster, Texas; and DVA Dallas-	nt by Donald Kelly, Chief Negotiator for Veterans Affairs North Texas agion 17; Veterans Canteen Service, Dallas, Texas; DVA Consolidated
SEE ATTACHED	
•	
•	
ı	
	4
	•
7. Have you or anyone else raised this matter in any other procedure?	No Yes If yes, where? (sep reverse)
BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATE 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BE	STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND EMENTS CAN BE PUNISHED BY PINE AND IMPRISONMENT, 18 U.S.C. OX #3 BY [check "x" box] Fax 1 SI Class Mail In Person
Commercial Delivery Certified Mail	. 0
Donald Kelly, SPHR	10/02/2014
Donald Kelly, SPHR	our Signature Date

FLRA Form 23 (Rev. 1/99)



11:03 20

Form Exempt Under 44 U.S.C. 3512



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY

Case No. DA- CA-15-0015

CHARGE AGAINST AN AGENC	UA- UA- 10- UU 10
	Date Filed OCT = 8 2014
Complete instructions are on the back of this form.	
1. Charged Activity or Agency Name: Dallas VAMC Address: 4500 S. Lancaster Rd Dallas, TX 75216	2. Charging Party (Labor Organization or Individual) Name: AFGE Local 2437 Address: PO Box 397963
Tel.#: (214) 857-1166 Ext. Fax#:	Dallas, TX 75339 Tel.#: (214) 857-0074 Ext. Fax#: (214) 857-0077
3. Charged Activity or Agency Contact Information Name: Joseph Dalpiaz, Jeff Milligan Title: VISN 17 Director & Dallas VAMC Director Address: 4500 S. Lancaster Rd Dallas, TX 75216 Tel.#: (214) 857-1166 Ext. Fax#: 5. Which subsection(s) of 5 LLS C. 7446(s) down tells.	4. Charging Party Contact Information Name: Donald Burrell Title: President, AFGE Local 2437 Address: PO Box 397963 Dallas, TX 75339 Tel.#: (214) 857-0074 Ext. Fax#: (214) 857-0077
5. Which subsection(s) of 5 U.S.C. 7116(a) do you believe have been violated	1? [See reverse] (1) and 7116(a)(2), (a)(5)
6. Tell exactly WHAT the activity (or agency) did. Start with the DATE and L Since on or about September 15, 2014, and at all times thereafter, in Dalpiaz (VISN 17 Director), Jeff Milligan (Director, Dallas VAMC), Perharmacy Service), Barbara Rogers (Chief, HR) and Susan Duquai negotiate in good faith concerning matters affecting working conditions to honor the negotiated official time granted to Dr. Jerica G Local 2437's negotiation team for the Local Supplemental Agreeme bargaining and repudiated an agreement (Ground Rules for Negotiationally, the Dallas VAMC refusal to honor the Ground Rules for have all members of its Negotiation team available for contract negotiand Dr. Jerica Goodwin solely because of her protected activity and 2437.	the Dallas VAMC, by its supervisor, official, and/or agent, Joseph eter Dancy (Associate Director), Ruth Ann Bechdol (Chief, ine (Assistant Chief, Clinical Services) has refused to consult or ons with AFGE Local 2437, as exclusive representative, by codwin as an alternate delegate and team member of AFGE int (LSA). Additionally, the Dallas VAMC has exhibited bad faith attorn of the LSA) reached with AFGE 2437 on April 10, 2014.
7. Have you or anyone else raised this matter in any other procedure? 🗸 No	Yes If yes, where? [see reverse]
I. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATE BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS 001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX #3 BY Commercial Delivery Certified Mail	MENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND
Donald Burrell Donald	// 40 00/22/2014
Type or Print Your Name Your Signs	<u>13. Il</u> 09/23/2014



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

	FOR FLI	RA USE		
Case No.	-CA-	15-	0032	
Date Filed	00	ነዋ ል		

CHARGE AGAINST	AN AGENCY	Date Filed	OCT.2 4 2014
1. AGENCY AGAINST WHICH CHARGE IS BR	OUGHT 2.	CHARGING PARTY	y
a. Name of Charged Agency (include address, city, state, & ZIF	a. Nar	ne of Charging Party (inc	clude address, city, state, & ZIP)
Dallas VAMC	AFG	E Local 2437	
4500 S. Lancaster Rd.	į.	OX 39796	
Dallas, TX 75216	Dalla	ns, TX 75339	
b. Agency Representative (include name, title, address)	b. Cha	rging Party Representati	ve (include name, title, address)
Joseph Dalpiaz, Jeff Milligan	Don	ald Burrell	
VISN 17 Director & Dallas VAMC Director	Pres	ident, AFGE Local 24	437
4500 S. Lancaster Rd	į .	OX 397960	
Dallas, TX 75216	Dalla	is, TX 75339	
tel. (214)857-1166 fax	tel. (214)857-4500	fax
e-mail jeffery.milligan@va.gov	e-mail		donald.burrell@va.gov
3. BASIS OF THE CHARGE	Cittai		donaid.bdriene va.gov
			
a. Set forth a clear and concise statement of the facts co	onstituting the alleged unfa	ir labor practice, includ	ling date and location of the particular acts.
Dalpiaz (VISN 17 Director), Jeff Milligan (Director, negotiate in good faith concerning matters affect unilaterally changing the location of negotiations the VISN 17 Executive Conference room located i September 24, 2014 pursuant the Ground Rules f	ling working conditions for the Local Suppleme n Arlington, TX. The pa	with AFGE Local 24 ental Agreement (LS	37, as exclusive representative, by (A) scheduled for October 6-10, 2014 in
Additionally, the Dallas VAMC has exhibited bad f LSA) reached with AFGE Local 2437 on April 21, 2			
			•
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believ	e the Agency has violated?	(1) 国 (2) 国 (3	3) 🗆 (4) 🗅 (5) 🗷 (6) 🖵 (7) 🗖 (8) 🗖
c. Have you or anyone else raised this matter in any			
Personal Control of the Control of t	ederal Mediation and Con-		If yes, where?
_	erit Systems Protection B		Federal Service Impasses Panel Office of Special Counsel
	agotiability Appeal to FLR		Other
4. DECLARATION			
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT			
I UNDERSTAND THAT MAKING WILLFULLY FALSE STATE			ONMENT, 18 U.S.C. 1001.
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED	D IN BOX 1b BY [check all a	appropriate boxes]	•

☐ Commercial Delivery

Your Signature

☐ 1st Class Mail

Donald Burrell

Type or Print Your Name

■ Fax

In Person

☐ e-mail (see reverse)

10/18/2014

Date

☐ Certified Mail



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

		FOR FLRA U	SE ONLY	_
Case No.	DA.	CA-15	-0023	 }

Date Filed

	UCT 2 4 2014
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437
4500 S. Lancaster Rd.	PO BOX 39796
Dallas, TX 75216	Dallas, TX 75339
. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
oseph Dalpiaz, Jeff Milligan	Donald Burrell
/ISN 17 Director & Dallas VAMC Director	President, AFGE Local 2437
1500 S. Lancaster Rd	PO BOX 397960
Dallas, TX 75216	Dallas, TX 75339
1. (214)857-1166 fax	tel. (214)857-4500 fax
nail jeffery.milligan@va.gov	
	e-mail donald.burrell@va.gov
BASIS OF THE CHARGE	
Set forth a clear and concise statement of the facts constituting the al	lleged unfair labor practice, including date and location of the particular acts.
014.	21, 2014 and the Memorandum of Agreement reached on April 24
•	
	•
•	
·	
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has	
Have you or anyone else raised this matter in any other procedure	,,
	and Conciliation Service
Equal Employment Opportunity Commission	
other Administrative or Judicial Proceeding ☐ Negotiability Apper DECLARATION	al to FLRA Other
CLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENT! IDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE P	S IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.
S CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 16 BY [c	thack all appropriate haves
- D	
h Comme	ercial Delivery Certified Mail e-mail (see reverse)
Donald Burrell Dames 15	3 10/18/2014
Type or Print Your Name	



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

		FOR	FLRA	USE	ONLY
Case No.	Λ			<i></i>	

Date Filed

OCT 2 4 2014

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437
4500 S. Lancaster Rd.	PO BOX 39796
Dallas, TX 75216	Dallas, TX 75339
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Joseph Dalpiaz, Jeff Milligan	Donald Burrell
VISN 17 Director & Dallas VAMC Director	President, AFGE Local 2437
4500 S. Lancaster Rd Dallas, TX 75216	PO BOX 397960
Dallas, 17 /3210	Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	C 1144
	ged unfair labor practice, including date and location of the particular acts.
Since on or about October 10, 2014, and at all times thereafter, the	
Dalpiaz (VISN 17 Director), Jeff Milligan (Director, Dallas VAMC), E	
has interfered with, restrained and coerced, and is interfering with	
rights guaranteed in Section 7102 of the Federal Service Labor-Miconduct: the refusal to allow Dr. Gerald Goodwin to serve as a pe	
disciplinary action, refusing to provide Dr. Goodwin with the evid	
and unilaterally determining that Mr. Smith is not a member of th	
	of retaliation, discrimination, and reprisal against Dr. Goodwin for
having engaged in activities protected by the Statue and serving a	
mismanagement, discrimination, and abuse of authority within VI	SN 17 and the Dalias VAMIC to members of Congress, assisting named facilities, participating in informational pickets at the VISN
17 headquarters, representing employees as an Union Officer, an	
	a ming griotalices, etc.
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vi	olated? (1) (2) (3) (4) (5) (6) (7) (8) (1
c. Have you or anyone else raised this matter in any other procedure?	No ■ Yes □ If yes, where?
	nd Conciliation Service
☐ Equal Employment Opportunity Commission ☐ Merit Systems Prote ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal	
4. DECLARATION	
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS	
I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUTHIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [ch	!
	cial Delivery
Commer	Gor Denvery — Certified Iviali — E-Mail (See reverse)
Donald Burrell	2 10/18/2014
Type or Print Your Name	r Signature Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY

Case No. DA - CA - 15 - 0053

Date Filed

NOV 1 2 2014

	X & CO14
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437
4500 S. Lancaster Rd.	PO BOX 397960
Dallas, TX 75216	Dalla s, TX 75339
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Joseph Dalpiaz, Jeff Milligan	Donald Burrell
VISN 17 Director & Dallas VAMC Director	P0 BOX 397960
4500 S. Lancaster Rd	Dallas, TX 75339
Dallas, TX 75216	
tel. (214)857-1166 fax	tal (2.14)9F7.4F00
	tel. (214)857-4500 fax
jonet y atting an evaluation	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
 Set forth a clear and concise statement of the facts constituting the a 	alleged unfair labor practice, including date and location of the particular acts.
consult or negotiate in good faith concerning matters affecting	refusing to fulfill its bargaining obligation related to the criteria and
	·
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency ha	s violated? (1) 1 (2) 1 (3) 1 (4) 1 (5) 1 (6) 1 (7) 1 (8) 1
c. Have you or anyone else raised this matter in any other procedur	e? No ■ Yes □ If yes, where?
·	n and Conciliation Service
🗖 Equal Employment Opportunity Commission 💢 Merit Systems Pro	
☐ Other Administrative or Judicial Proceeding ☐ Negotiability App	eal to FLRA 🔲 Other
4. DECLARATION	,
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMEN UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE	TS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY	[check all appropriate boxes]
- I - D	nercial Delivery Certified Mail e-mail (see reverse)
Donald Burrell	10/24/14
Type or Print Your Name	Your Signature Date
	Uate



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY

Case No. DA-CA-15-0054

CHARGE AGAINST AN AGENCY Date Filed

NOV1 2 2014

		MOAT S Sold
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PAR	RTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party	(Include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437	
4500 S. Lancaster Rd.	PO BOX 397960	
Dallas, TX 75216	Dallas, TX 75339	•
	,	
. Agency Representative (include name, title, address)	h Charging Darks Demande	
oseph Dalpiaz, Jeff Milligan		ntative (include name, title, address)
/ISN 17 Director & Dallas VAMC Director	- Donald-Burrell	
4500 S. Lancaster Rd	PO BOX 397960	
Pallas, TX 75216	Dallas, TX 75339	
,		
(214)057 1166		
(214)857-1166 fax	tel. (214)857-4500	fax
mail jeffery.milligan@va.gov	e-mail	donald.burrell@va.gov
BASIS OF THE CHARGE		
e pharmacy technicians to receive calls placed from a phone orking conditions were a result of a unilateral change in phone 1573 for the specific purpose of enacting the aforementioned	ne extensions in the inpatie	ent technician work area from 70573 to
Which subsection(s) of 5 U.S.C. 7116(a) do you helieve the Agency has	ruci a Iti Shatoliva	
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has		(3) 口 (4) 口 (5) 包 (6) 口 (7) 口 (8) 口
Have you or anyone else raised this matter in any other procedure	e? No ■ Yes □	If yes, where?
Have you or anyone else raised this matter in any other procedure	e? No M Yes 🗆	If yes, where?
Have you or anyone else raised this matter in any other procedure irievance Procedure qual Employment Opportunity Commission Federal Mediation Merit Systems Procedure	e? No M Yes n and Conciliation Service of otection Board	If yes, where? ☐ Federal Service Impasses Panel ☐ Office of Special Counsel
Have you or anyone else raised this matter in any other procedure Federal Mediation Gual Employment Opportunity Commission	e? No M Yes n and Conciliation Service of otection Board	If yes, where?
Have you or anyone else raised this matter in any other procedure Grievance Procedure Qual Employment Opportunity Commission Other Administrative or Judicial Proceeding DECLARATION CLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENT IDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [e? No No Yes In and Conciliation Service In and Conciliation Service Interction Board Interction Board Interction Board Interction I	If yes, where? Federal Service Impasses Panel Office of Special Counsel Other ST OF MY KNOWLEDGE AND BELIEF. RISONMENT, 18 U.S.C. 1001.
Have you or anyone else raised this matter in any other procedure Grievance Procedure Griev	e? No No Yes In and Conciliation Service In and Conciliation Service Interction Board Interction Board Interction FLRA Interction The BESPUNISHED BY FINE AND IMPR	If yes, where? Federal Service Impasses Panel Office of Special Counsel Other ST OF MY KNOWLEDGE AND BELIEF. RISONMENT, 18 U.S.C. 1001.
Have you or anyone else raised this matter in any other procedure Grievance Merit Systems Proceding Merit Systems Proceding Megotiability Appointer Administrative or Judicial Proceeding DECLARATION GCLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENT NOT THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE SCHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [e? No No Yes In and Conciliation Service In and Conciliation Service Interction Board Interction Board Interction Board Interction I	If yes, where? Federal Service Impasses Panel Office of Special Counsel Other ST OF MY KNOWLEDGE AND BELIEF. RISONMENT, 18 U.S.C. 1001.



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

	FORFLE	CA USE UN	LY
Case No.	7-CA	-15-	0055

Date Filed

	NUV 1 2 2014
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437
4500 S. Lancaster Rd.	PO BOX 397960
Dallas, TX 75216	Dallas, TX 75339
·	
h A	
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Joseph Dalpiaz, Jeff Milligan VISN 17 Director & Dallas VAMC Director	Donald Burrell
4500 S. Lancaster Rd	PO BOX 397960
Dallas, TX 75216	Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the a	illeged unfair labor practice, including date and location of the particular acts.
allocated to bargaining unit employees within the main pharm #1B520E-2J-d (former ADPAC office) without prior notification	to or fulfilling its bargaining obligations.
o. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency ha	s violated? (1) 🗏 (2) 🗖 (3) 🗖 (4) 🗖 (5) 🗐 (6) 🗖 (7) 🗖 (8) 🗖
Have you or anyone else raised this matter in any other procedure	e? No ■ Yes □ If yes, where?
☐ Grievance Procedure ☐ Federal Mediation	n and Conciliation Service
☐ Equal Employment Opportunity Commission ☐ Merit Systems Proportion ☐ Merit Systems Proportion ☐ Negotiability App	
J Other Administrative or Judicial Proceeding ☐ Negotiability App 1. DECLARATION	eal to FLRA Other
	TO NOT THE TOTAL
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMEN UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE	PUNISHED BY FINE AND IMPRISONMENT 18 H.S.C. 1001
HIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b by [check all appropriate boxes
The Barrier and the Control of the C	recial Delivery
Donald Burrell	3 10/24/14
Type or Print Your Name	our Signature Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY			
DA - CA - 15 - 0056			
Date Filed NOV 1 9 2014			

	NUV I 2 2014
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) Dallas VAMC 4500 S. Lancaster Rd. Dallas, TX 75216	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PO BOX 397960 Dallas, TX 75339
b. Agency Representative (include name, title, address) Joseph Dalpiaz, Jeff Milligan	b. Charging Party Representative (include name, title, address) Donald Burrell
VISN 17 Director & Dallas VAMC Director 4500 S. Lancaster Rd Dallas, TX 75216	PO BOX 397960 Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-0074 fax
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
2437, as exclusive representative, by unilaterally changing workin (physician assistants) to provide on-call coverage without fulfilling	g its bargaining obligation.
o. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vio	plated? (1) 图 (2) □ (3) □ (4) □ (5) 围 (6) □ (7) □ (8) □
 Have you or anyone else raised this matter in any other procedure? ☐ Grievance Procedure ☐ Federal Mediation ar ☐ Equal Employment Opportunity Commission ☐ Merit Systems Protect ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal 	ction Board
DECLARATION	
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS! UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUI HIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [che In Person	NISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. ck all appropriate boxes]
Donald Burrell	10/24/14
Type or Print Your Name You	r Signature Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

į	FOR FLRA USE ONLY			
	Case No. DA - CA - 15 - 0057			
	Date Filed			

CHAPCE ACAPTER AND ACTION	DA-CA-15-0051					
CHARGE AGAINST AN AGENCY	1					
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY					
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)					
Dallas VAMC	AFGE Local 2437					
4500 S. Lancaster Rd.	PO BOX 397960					
Dallas, TX 75216	Dallas, TX 75339					
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)					
Joseph Dalpiaz, Jeff Milligan						
VISN 17 Director & Dallas VAMC Director	PO BOX 397960					
4500 S. Lancaster Rd	Dallas, TX 75339					
Dallas, TX 75216						
tel. (214)857-1166 fax	tel. (214)857-4500 fax					
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov					
3. BASIS OF THE CHARGE						
a. Set forth a clear and concise statement of the facts constituting the alleg						
	ł					
Since on or about October 12, 2014, and at all times thereafter, the	e Dallas VAMC, by its supervisor, official, and/or agent, Joseph					
Dalpiaz (VISN 17 Director) and Jeff Milligan (Director, Dallas VAMC matters affecting working conditions with AFGE Local 2437, as exc) has refused to consult or negotiate in good faith concerning					
by relocating the Dialysis unit from the 3rd floor of the medical ce	oter to the SCI sym without prior potification to and/or fulfilling					
its bargaining obligations.	The set gym without prior floatication to alteror funning					
·						
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vio	Sated? (1) (2) (3) (1) (4) (1) (5) (6) (1) (7) (1) (8) (1)					
c. Have you or anyone else raised this matter in any other procedure?	No ■ Yes □ If yes, where?					
☐ Grievance Procedure ☐ Federal Mediation an						
☐ Equal Employment Opportunity Commission ☐ Merit Systems Protec ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal t						
4. DECLARATION	o FLRA					
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS II UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE DUI	N IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.					
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1h RV Ichai	I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]					
■ In Person □ 1st Class Mail ■ Fax □ Commerci						
Α	— Cortined Wall Li e-Mail (See Feverse)					
Donald Burrell	10/24/14					
Type or Print Your Name Your	Signature Date					

Your Signature

Form Exempt Under 44 U.S.C. 3512

UNITED STATES OF AMERICA

FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY

Date Filed: 12/3/2014

Case Number: DA-CA-15-0078

Charged Activity or Agency

Name: DEPARTMENT OF VETERANS AFFAIRS, Medical Center

Address: Dallas, TX
Phone No.: Fax No.:

Charged Activity or Agency Contact Information

Email: jeffery.milligan@va.gov

Name: Mr. Jeff Milligan

Title: Director

Address: VA Medical Center, 4500 S. Lancaster Road, Dallas, TX 75216

Phone No.: (214) 857-1112 Fax No.:

Charging Party (Labor Organization or Individual)

Name: AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, AFL-CIO, Local 2836

Address: Bonham, TX
Phone No.: Fax No.:

Charging Party Contact Information

Email: danny.loyd@va.gov

Name: Mr. Danny Loyd

Title: Chief Steward, AFGE Local 2836

Address: 1201 E 9th St, Bonham, TX 75418

Phone No.: (903) 449-9560 Fax No.:

5. Which subsection(s) of 5.U.S.C. 7116(a) do you believe have been violated?

(a)(1), (a)(5), (a)(6), (a)(8)

6. Tell exactly WHAT the activity (or agency) did. Start with the DATE and LOCATION, state WHO was involved, including titles:

On October 2, 2014, I requested a copy of records on a case that was being handled for an employee by an outside attorney. This was well within the rights of the employee, but as the sole representative for all bargaining unit employees, AFGE Local 2836 should have been in on every meeting and conference call concerning this matter. Having received no reply by October 7, 2014, I submitted a formal request on Union letterhead again requesting the information. The same day that Ms. Franks received the request, I was given a reply that we were not entitled to the information because we were not the employees representative. I reminded Ms. Franks that according to the Statute and the Master Agreement between AFGE and VA, we were the sole representative for all employees and therefore entitled to any all documentation concerning this case. By October 27, 2014, I had not heard anything back in response to my request, therefore I filed a 3rd Step grievance against management with Jeffery Milligan, Director VANTHCS, for failure to supply information. Mr. Milligan then assigned the case to Ms. Franks, the individual that had not complied with original request. As of the date of this filing, we have not received the information or a reply to our grievance. I feel that this action not only violates 5 U.S.C. 7116(a) as indicated but also 5 U.S.C. 7114(b)4 which deals with the right of the Union to requested information. This is why I feel that this matter is applicable to come before the Authority after it has been addressed in the grievance process. The Agency continues to withhold the information and also appears to not want to negotiate in good faith on this matter.

7. Have you or anyone else raised this matter in any other procedure?

Yes

If yes, where?

3rd Step Grievance dated October 27, 2014 to which we have no reply.

8. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON ALL PERSONS IDENTIFIED IN BOX #3 BY:

Email ⊠ In Person⊡	Fax ☐ Comm.Delivery☐	First Class Mail Certified Mail	First Class Mail Certified Mail	
Danny Loyd	Signed: Dar	nny Loyd	12/3/2014	
Type or Print your name	Your Sigr	nature	Date	



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

		FOR	flra us	E ONL	Y	
Case No.	DA	10	100	\bigcirc	<u></u>	-1

	MAR 1 3 2015				
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY				
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)				
Department of Veteran's Affairs	AFGE Local 2437				
4500 S. Lancaster Rd	PO Box 397960				
Dallas, TX 75216	Dallas, TX 75339				
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)				
Barbara Rogers	! Donald R. Burrell				
Acting Chief Negotiator (vice Donald Kelley)	PO Box 397960				
4500 S. Lancaster Rd	Dalfas, TX 75339				
Dallas TX 75216					
tel. (214) 857-2010 fax (214) 302-1407	tel. 214-857-4500 fax 214-857-0077				
e-mail barbarar.rogers@va.gov	e-mail donald.burrell@va.gov				
	Te-man donate.borrenewa.gov				
Set forth a clear and concise statement of the facts constituting the alle	ged unfair labor practice, including date and location of the particular acts.				
ON 3/9/15, Barbara Rogers, Acting as Chief Negotiator for the Agmanagement Article 10) disallowed by the Article 19 of the Grou	gency, introduced for negotiation an article on MOUs (labeled by				
The logarithm is a set of all all of the set of the order	TO NOTES (ETICLOSES) CHECENY DOLEANINIE IN DOCUMENT.				
•					
	•				
	į				
b. Which subsection(s) of 5 U.S.C. 7115(a) do you believe the Agency has v	riolated? (1) 3 (2) 4 (3) 4 (5) 6 (6) 7 (7) 8 9				
c. Have you or anyone else raised this matter in any other procedure?	No ■ Yes □ If yes, where?				
☐ Grievance Procedure ☐ Federal Mediation	and Conciliation Service				
☐ Equal Employment Opportunity Commission ☐ Merit Systems Prot ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appea	* ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '				
4. DECLARATION	TOTERA LI OCIE				
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS I UNDERSTAND THAT MAKING WILLELITY FALSE STATEMENTS CAN BE DE	IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.				
	UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. HIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]				
	rcial Delivery Certified Mail e-mail (see reverse)				
Donald R. Burrell					
Non	ur Signature Date				



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY

Date Filed

CHARGE AGAINSI	ANAGENCI		APR 1 6 2015		
1. AGENCY AGAINST WHICH CHARGE IS B	ROUGHT 2.	CHARGING PART	Υ		
a. Name of Charged Agency (include address, city, state, &	ZIP) a. Na	a. Name of Charging Party (include address, city, state, & ZIP)			
Dallas VA Medical Center (549)	3	Gregory J. Bijak MD			
4500 S Lancaster Av Dallas TX 75216	· · · · · · · · · · · · · · · · · · ·	3 Becky Ln Ixahachie TX 75165			
Deligo IV \2510	VVc	ixanacine iv /3163			
b. Agency Representative (include name, title, address)	b. Cl	arging Party Represent	ative (include name, title, address)		
Jeffery L. Milligan		egory J. Bijak MD			
Director		3 Becky Ln exahachie TX 75165		٠	
Dallas VA Medical Center (549) 4500 S Lancaster Av	VV	Adiacine ix / Jius		•	
Dallas TX 75216			•		
tel. 214.857.1150 fax	tel.	469.552.6519	fax		
e-mail jeffery.milligan@va.gov	e-m	ail	gbijak@hotmail.com		
3. BASIS OF THE CHARGE			A		
a. Set forth a clear and concise statement of the fact	s constituting the alleged ur	nfair labor practice, inc	uding date and location of the parti	icular acts.	
I am a physician at the VA North Texas Health Sunder 5 U.S.C. 7114 of the United States Code. (Chairman, Anesthesiology and Pain Managem representative present at this meeting. Only af I believed that this meeting was regarding poteme resign full time employment under false president physician trainees about my job performance of the Union to John February 18, 2015, I was called once again would like a representative from the union to John February 19, 2015), I was order office "by the end of the day" - which left me 1 The next day (February 19, 2015), I was order office (Pamela Gilchrist) on an equipment issue waiting, at which time he handed me a letter of the state of t	On January 12, 2015, I ent Service, Dallas VA Meter I insisted, did he releases. Shortly after the mance in retaliation for to Dr. Sum-Ping's office join us, he threatened not be minuted until the enced by Edmund Perry (Ace (exchange of a pager),	was called into the Medical Center). He ent. against me, given his meeting, Dr. Surer exercising my right for disciplinary reache with further disciplinary. In the day.	office of my supervisor, Dr. Surefused to allow me to have a Dr. Sum-Ping's ongoing coercion-Ping solicited false statement to have a union representations. When I informed Dr. Sumplinary action should I not cort) to come to the department series.	m-Ping union . on to have ts from ive present. o-Ping that I me to his	
b. Which subsection(s) of 5 U.S.C. 7116(a) do you be		d? (1) 🖹 (2) 🗏	(3) 🗆 (4) 🖻 (5) 🗖 (6) 🖸 (7)	(8) (
c Have you or anyone else raised this matter in a		No ■ Yes □	If yes, where?	1	
	l Federal Mediation and C l Merit Systems Protectior		 □ Federal Service Impasses Panel □ Office of Special Counsel 		
	Negotiability Appeal to F		□ Other		
4. DECLARATION					
I DECLARE THAT I HAVE READ THIS CHARGE AND TH I UNDERSTAND THAT MAKING WILLFULLY FALSE STA THIS CHARGE WAS SERVED ON THE PERSON IDENTI	ATEMENTS CAN BE PUNISH	HED BY FINE AND IMP	ST OF MY KNOWLEDGE AND BELII RISONMENT, 18 U.S.C. 1001.	EF.	
	ax	,	fied Mail	erse)	
Gregory J. Bijak	MI		April 14, 20	015	
Type or Print Your Name	/// / Your Si	gnature	Date		

Form Exempt Under 44 U.S.C. 3512

FLRA Form 22 (Rev. 10/2014)



Form Exempt Under 44 U.S.C. 3512

UNITED STATES OF AMERICA

FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY

Date Filed: 5/12/2015

Case Number: DA-CO-15-0250

CHARGE AGAINST A LABOR ORGANIZATION

Charged Labor Organization

Name: AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, AFL-CIO, Local 2437

Address: Dallas, TX

Phone No:

Fax No.

Charged Labor Organization Contact Information

Email: donald.burrell@va.gov

Name: Donald Burrell

Title: President

Address: POB 397960, Dallas, TX 75339

Phone No: (214) 847-4500 **Fax No.** (214) 857-0077

Charging Party (Individual, Labor Organization, Activity or Agency)

Name: INDIVIDUAL

Address: 9670 Forest Lane, Dallas, TX 75243

Phone No: (214) 937-7924

Fax No.

Charging Party Contact Information

Email: curtisdrprec1@att.net

Name: Delores P Curtis

Title: Secretary

Address: 9670 Forest Lane, #1116, Dallas, TX 75243

eFiling No. <u>810002821</u> FLRA Form 23(Rev 1/99)

Phone No: (214) 934-7924

Fax No.:

- 5. Which subsection(s) of 5.U.S.C. 7116(b) and/or (c) do you believe have been violated? (b)(4), (c)(1), (c)(2)
- 6. Tell exactly WHAT the labor organization did. Start with the DATE and LOCATION, state WHO was involved, including titles:

This is a formal grievance complaint against AFGE/AFL-CIO, Local 2437. The local union is located at the Veterans Hospital in Dallas, Texas. Below you will find chronological order of events supporting my grievance complaint.

04/21/15

member.

AFGE representatives presented at "new employee" orientation during which the presentation was very intense, story-laced with examples of why employees need AFGE representation, fast-paced, and accompanied with a \$100.00 incentive for those who joined. I am stating, officially, that I felt coerced to join for fear of non-representation, if and when needed. The same atmosphere was inclusive for enrollment for AFGE Life Insurance.

Later, after reaching home and being unable to sleep because I felt I had made an ill-advised decision to enroll as a member of Local 2437, I knew that I must request cancellation of my enrollment. 04/22/15

Contacted Mr. Munoz and requested withdrawal from the enrollment, as he passed out his card at orientation. He informed me, during a follow-up call I placed to his cell, that he would destroy my enrollment for life insurance. He further informed me that I had to contact the AFGE office regarding membership enrollment. These events occurred during early morning business hours.

I placed a call to AFGE Local 2437 business office. I explained my desire to withdraw my enrollment. I was told that it would be impossible because the fiscal office had the enrollment form and it had already been encoded. This was not true regarding encoding. I contacted Ms. Brown, Bldg., 45 Fiscal Services, in person. We spoke and she said all she needed was SF-1188 and that it usually takes approximately two weeks for new memberships to be input into the system. A copy of my application was provided to me. I read it thoroughly this time. At orientation, no mention was made regarding inability to withdraw. The forms were given to us. We were told to fill them out and given \$100 incentives for becoming a new

I emailed Mr. Donald Burrell, authorizing official on SF 1187, detailing my conflict with Local 2437. The SF 1187 is self-explanatory regarding withdrawal procedure. I further understand that Standard Form 1188, Cancellation of Payroll Deductions for Labor Organization Dues, is available from my empowering agency, and that I may cancel this authorization by filling out Standard Form 1188 or other written cancellation request with the payroll office. The statement on Form 1187 regards allotments. I do not have any charged allotments in payroll at the time of my request to terminate enrollment application.

I am not a member of the union until my application is keyed into the payroll system. I attempted to do everything in my power, within a reasonable turnaround time of less than 24 hours, to stop my application.

Local 2437 administrative office stone-walled me and refused to honor my request for withdrawal of my application. How can these unfair practices be tolerated? They are morally unethical in my situation. If I had been entered into the payroll system prior to my request for withdrawal, there would be no need for me to file a grievance. This is not the case. So, I was left with no other recourse than to fight for my rights as a veteran and government employee against the ethics of Local 2437.

According to Union Rights and Privileges, Article 45, Section 6, Sub-section A, I quote..."In order for the SF-1188 to be timely, it must be submitted to the union during the 10 calendar days ending on the anniversary date of original allotment..." I have no original allotment at this time so I have no anniversary date.

Hence, as of this writing and date, my encoding to the payroll system had not occurred before I requested SF-1188. How can it be a binding agreement when there is no allotment assigned in the fiscal payroll system?

The actions of Local 2437 will present harmful financial hardship on a PTSD service-connected female veteran. I had the \$100 incentive given during orientation enrollment with me to return to Local 2437 today. I was met with hostility at the local union office.

This is unacceptable and un-American. There was no mention by union representatives that signing for enrollment was Binding and that there was NO GRACE PERIOD.

7. Have you or anyone else raised this matter in any other procedure?

Yes

If yes, where?

tjohnsinc@aol.com, thomaa1@afge.org, BORERD@afge.org

District Ofc by voicemail to Cheryl Eliano

8. DI DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON ALL PERSONS IDENTIFIED IN BOX #3 BY:

Email ⊠	Fax ⊠	First Class N	
in Person□	Comm.Delivery⊡	Certified Mai	
Delores P Curtis Type or Print your name	Signed: Delo Your Si g		5/12/2015 Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

		FOR	FLRA	
O NEO	_			

CHARGE AGAINST AN AGENCY	MAY 2 8 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) Dallas VAMC & VISN 17 4500 S. Lancaster Rd. Dallas, TX 75216	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PO Bo×397960 Dallas, TX 75339
b. Agency Representative (include name, title, address) Wendell Jones, Jeff Milligan VISN 17 Network Director & Dallas VAMC Director	b. Charging Party Representative (include name, title, address) Donald Burrell President, AFGE Local 2437 PO Box 397960 Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeff.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
against Ms. Madsen for having engaged in activities protected by	ine Statue.
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vic	lated? (1) (2) (3) (4) (2) (5) (6) (7) (2) (8) (7
c. Have you or anyone else raised this matter in any other procedure? ☐ Grievance Procedure ☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal to the Agency has violated the Agency has	No□ Yes□ If yes, where? d Conciliation Service □ Federal Service Impasses Panel tion Board □ Office of Special Counsel
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS II UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUN THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [che In Person	IISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. ck all appropriate boxes]



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN ACENCY

FOR FLRA USE ONLY Case No.

CHARGE AGAINST AN AGEN	MAY 2 8 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) Dallas VAMC & VISN 17 4500 S. Lancaster Rd. Dallas, TX 75216	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PO Box 397960 Dallas, TX 75339
b. Agency Representative (include name, title, address) Wendell Jones, Jeff Milligan VISN 17 Network Director & Dallas VAMC Director	b. Charging Party Representative (include name, title, address) Donald Burrell President, AFGE Local 2437 PO Box 397960
tel. (214)857-1166 fax	Dallas, TX 75339 tel. (214)857-4500 fax (214)857-0077
e-måll jeff.milligan@va.gov 3. BASIS OF THE CHARGE	e-mail donald.burrell@va.gov
	olleged unfair labor practice, including date and location of the particular acts.
during negotiations of the Local Supplemental Agreement, Arti	n bargaining and attempted to change an an agreement reached icle 7 Section 2a.
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has	s violated? (1) 画 (2) 口 (3) 口 (4) 口 (5) 画 (6) 画 (7) 口 (8) 口
Have you or anyone else raised this matter in any other procedure ☐ Grievance Procedure ☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appe	P? No□ Yes□ If yes, where? Pand Conciliation Service □ Federal Service Impasses Panel processor □ Office of Special Counsel
	TAIN IT ADD TO THE TOTAL TO THE
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENT UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PHIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [c] In Person	PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.
Donald Burrell Donald	D May 1, 2015
Type or Print Your Name You	our Signature Date

Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

	FOR	FLRA	USE	ONL
4.1				

se No. DA - CA - 15

Date Filed

MAY 2 8 2015

	MIMI Z O COIO
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC & VISN 17	AFGE Local 2437
4500 S. Lancaster Rd.	PO Box 397960
Dallas, TX 75216	Dallas, TX 75339
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Wendell Jones, Jeff Milligan	Donald Burrell
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437
	PO Box 397960
	Dallas, TX 75339
tol /214\057 1166	
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeff.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the alle	ged unfair labor practice, including date and location of the particular acts.
Local 2437 and retaliated and engaged in reprisal against Ms. Ma Additionally, the above engaged in bad faith bargaining and reputhe Union that Ms. Madsen would not be required to submit a data.	ication to Ms. Deon Madsen requiring her to submit a daily review les because of her membership and/or activities related to AFGE dsen for having engaged in activities protected by the Statue. diated an agreement reached on April 6, 2015 by the agency and aily review of tasks.
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vi	olated? (1) (2) (3) (3) (4) (5) (6) (7) (8) (
c. Have you or anyone else raised this matter in any other procedure?	No □ Yes □ If yes, where?
☐ Grievance Procedure ☐ Federal Mediation a	nd Conciliation Service
☐ Equal Employment Opportunity Commission ☐ Merit Systems Prote ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal	ction Board
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal 4. DECLARATION	to FLRA Other
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PU THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [chile] In Person	NISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. eck all appropriate boxes]
Donald Burrell Smald P	May 1, 2015
Type or Print Your Name You	ur Signature



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

	FOR FLRA USE ONLY				
100	Case No. DA-GA-15-0307				
The state of the s	Date Filed				

S. S	AGE TO I	JUN 0 8 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUG	SHT 2. CHARGING F	PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Pa	arty (include address, city, state, & ZIP)
Department of Veteran of Affairs	AFGE Local 2437	
810 Vermont Ave., NW Washington, DC 20420	PO BOX 397960	
Washington, DC 20420	Dallas, TX 75339	
b. Agency Representative (include name, title, address)	b. Charging Party Repre	esentative (include name, title, address)
Gina Farrisee	Donald Burrell	,
Assistant Secretary for Human Resources and Admini	1	
810 Vermont Ave, NW	Dallas, TX 75339	
tel. (202)461-7750 fax	tel. (214)857-4500	fax
e-mail gina.farrisee@va.gov	e-mail	donald.burrell@va.gov
3. BASIS OF THE CHARGE		do national chief valgor
a. Set forth a clear and concise statement of the facts constit	uting the alleged unfair labor practice	Including data and least a set least a
		•
Since on or about October 24, 2014, and at all times t	nereafter, the Department of Ve	teran Affairs, by its supervisor, official, and/or
agent, Gina Farrisee (Assistant Secretary of HR&A), ha Union concerning the the investigation/review condu	s failed to provide the exclusive	representative with data requested by the
involved in the filling of the position of Associate Chie	f. Pharmacy. Clinical and Educati	on Broggams (and Associate Chief of Staff of
Education and the review of the decision to the place	the Patient Safety Officer on Au	thorized Absence at the Dallas VAMC thereby
being in violation of 7114(b)(4). This information is re	levant to the Unions's function a	is exclusive representative.
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the		
to the state of th		
c. Have you or anyone else raised this matter in any other Grievance Procedure	1	, ,
	Mediation and Conciliation Service vstems Protection Board	☐ Federal Service Impasses Panel ☐ Office of Special Counsel
m and the second	bility Appeal to FLRA	Other
4. DECLARATION		
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE S	TATEMENTS IN IT ARE TRUE TO THE	BEST OF MY KNOWLEDGE AND BELIEF.
UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENT	S CAN BE PUNISHED BY FINE AND IN	APRISONMENT, 18 U.S.C. 1001.
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BO In Person 回 1st Class Mail 回 Fax		· ·
	— Commercial Delivery LT Ce	ertified Mail
Donald Burrell	ul Barris	3/23/2014
Type or Print Your Name	Your Signature Your	Date

DA-CA-15-0308 Amended



UNITED STATES OF AMERICA

FOR FLRA USE ONLY

FEDERAL LABOR RELATIONS AUTHO	ORITY Case No. 1
CHARGE AGAINST AN AGEN	WA-CA-10-0308
	CY Date Flied SEP 0 4 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Altency (include address, city, state, is ziel	The state of the s
nallas AVMC	a. Name of Charging Perty (Include address, city, state, & ZIP)
4500 S. Lancester Rd	AFGE Local 2437
Dalles, TX 75216	PO BOX 397960
(214)857-1165	Dallas, TX 75339
	(214)857-4500
b. Agency Representative (Include name, title, address)	
Jeff Milligan	b. Charging Party Representative (include name, title, address)
Dallas VAMC Director	Ponald Burrell
4500 S. Lancaster Rd	President, AFGE Local 2427
Dallas, TX 75216	PO BOX 397960
(214)857-1166	Dallas, TX 75339
(7,557-4,165	(214)857-4500
tel.	ł
	tel. (214)857-4500 fax (214)857-0077
jeffery.millgan@va.gov	e-mail donald.burrell@va.gov
- THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the allege Since on par about May 24,2015, and at all times the	
Since on parabout Ass. The name	umair is bor practice, including date and location of the particular acts
Milligan (Director Dellar March and in the D	allas VAMIC, by its supervisore estimate
or negotiate in good faith concerning matters affecting working con refusing to honor the negotiated official time granted to Dr. Jerica G Local 2437's negotiation to a facility time granted to Dr. Jerica G	cy), and I-Telena Robinson (HR coerialist bear agents, Jeff
refusing to honor the opportisted official signatures affecting working con	iditions with AFGE Local 2437, as exclusive many
refusing to honor the negotiated official time granted to Dr. Jerica G Local 2487's negotiation team for the Local Supplemental Agreemer	Goodwin as a team member and sectorive representative, by
Local 2487's negotiation team for the Local Supplemental Agreemer bargaining and repudiated an agreement (Ground Rules for Negotial Additionally, the Dalles Vanne Control of the Control of t	It (LSA). Additionally the nalling wasco
our Man 20, 2016 the parties account Rules for Negotia	tion of the LSA) reached with Apoc 2007
Additionally, the Dallies Van Destroyed office of the	Ground Roles + refrest to no to the Company of April 10, 2014
have all members of its Negotiation to nonor the Ground Rules for	Negotiation of the ISA there of the Party of alternate formation
Additionally, the Dallas VAMIC refusal to nonor the Ground Rules for Negotias Additionally, the Dallas VAMIC refusal to nonor the Ground Rules for have all members of its Negotiation team available for contract nego and Dr. Jerica Goodwin solely based on her protected activity and is contracted.	tiations is an act alment to discourse and in Union's abuny to
and is c	lesigned to discourage many and allo intrimidate this Local
Leady, this acts represent continually retaliation and reprisal against the husband's, pr. Gerald Goodwin, affiliation and position with AFGE	the contraction within AFGE Local 2437.
her husband's, Dr. Gerald Goodwin - special and reprisal against D	Pr. Jerice Goodwin salely hamel on t
her husband's, Dr. Gerald Goodwin, affiliation and position with AFGE	Local 2437.
2012 during a brief meeting with Dr. Gerald Goodwin and I. Don Kall	tre wheels of a
On May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I. Don Keli	g space ream members had to be released by the Agency on official signal
b. Which subsection(s) of 5 11 2 C 72 CC 1	, and the state of
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated	7 (1) 回 (2) 回 (3) □ (4) □ (5) 图 (5) □ (7) □ (7)
1 TAVE 1990 til BRYONE Pice releadable	(3) LL (5) L (7) C (8) C
Grievance Procedure	No 网 Yes 口 If yes, where?
☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Agnostrative or Judicial Proceeding	
4. DECLARATION	, UTICE Of Special Countries
	L) Other
LUMPERTANT I HAVE READ THIS CHARGE AND THAT THE STATE OF	
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT AR I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED THIS CHARGE WAS SERVED ON THE PERSON INTO THE	ETRUETO THE BEST OF MY KNOWLEDGE AND BELLER
国 turn Chick (1948) M ROY (E my Car)	BY FINE AND IMPRISONMENT, 18 U.S.C. 1001
	-Lundring and Application
- commercial Dally	ery El Certified Mail 国 e-mail (see reverse)
Donald Burrell	- wine force (PA #12 m)
Type or Print Your Name	5/01/2-
orm Exempt Under 44 U.S.C 3512	
· · · · · · · · · · · · · · · · · · ·	Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY Case No. Date Filed

CHARGE AGAINST AN AGENCY

AGENCY AGAINST WHICH CHARGE IS BROUGHT		
	2. CHARGING PA	RTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Chareing Parts	/ (include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437	(monade address, dry, state, & ZIP)
4500 S. Lancaster Rd	PO BOX 397960	
Dallas, TX 75216	Dallas, TX 75339	
(214)857-1166	(214)857-4500	
	1224)637-4300	
b. Agency Representative (include name, title, address)	h Charging Backy Bonson	-1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.
Jeff Milligan	1	tative (include name, title, address)
Dallas VAMC Director	Donald Burrell	
4500 S. Lancaster Rd	President, AFGE Loca	I 2427
Dallas, TX 75216	PO BOX 397960	
(214)857-1166	Dallas, TX 75339	·
	(214)857-4500	
tel. fax	tel. (214)857-4500	fax (214)857-0077
e-mail jeffery.milligan@va.gov	e-mail	donald.burrell@va.gov
3. BASIS OF THE CHARGE		
a. Set forth a clear and concise statement of the facts constituting the alleg		
Local 2437's negotiation team for the Local Supplemental Agreem bargaining and repudiated an agreement (Ground Rules for Negot Additionally, the Dallas VAMC refusal to honor the Ground Rules for nave all members of its Negotiation team available for contract negotiation.	lation of the LSA) reache	d with AFGE 2437 on April 10, 2014.
and I	gotiations is an act almed is designed to discourage	d to discourage and intimidate this Loc membership within AFGE Local 2437.
asely, this acts represent continually retaliation and reprisal agains is husband's, Dr. Gerald Goodwin, affiliation and position with AF	gotiations is an act aime 's designed to discourage st Dr. Jerica Gooodwin sc GE Local 2437.	d to discourage and intimidate this Loc membership within AFGE Local 2437. lely based on her protected activity an
asely, this acts represent continually retaliation and reprisal agains	gotiations is an act aime 's designed to discourage st Dr. Jerica Gooodwin sc GE Local 2437.	d to discourage and intimidate this Loc membership within AFGE Local 2437. lely based on her protected activity an
asely, this acts represent continually retaliation and reprisal agains is husband's, Dr. Gerald Goodwin, affiliation and position with AF	gotiations is an act aimer is designed to discourage at Dr. Jerica Gooodwin sc GE Local 2437. Kelly stated team members h	If to discourage and intimidate this Loc membership within AFGE Local 2437. lely based on her protected activity and ad to be released by the Agency on official ti
astly, this acts represent continually retaliation and reprisal agains in husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don I Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violative you or anyone else raised this matter in any other procedure?	gotiations is an act aimer's designed to discourage at Dr. Jerica Gooodwin so GE Local 2437. Kelly stated team members heated? (1) I (2) I (5)	d to discourage and intimidate this Loc membership within AFGE Local 2437. lely based on her protected activity an ad to be released by the Agency on official to)口(4)口(5)回(6)口(7)口(8)口
astly, this acts represent continually retaliation and reprisal agains in husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don I Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the procedure? Have you or anyone else raised this matter in any other procedure? Grievance Procedure	gotiations is an act aimer's designed to discourage at Dr. Jerica Gooodwin so GE Local 2437. Kelly stated team members h ated? (1) I (2) I (2) No X Yes I (1)	I to discourage and intimidate this Loc membership within AFGE Local 2437. lely based on her protected activity an ad to be released by the Agency on official ti) 口 (4) 口 (5) 回 (6) 口 (7) 口 (8) 口 fyes, where?
askly, this acts represent continually retaliation and reprisal agains in husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don F Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the human procedure? Have you or anyone else raised this matter in any other procedure? Grievance Procedure	gotiations is an act aimed sidesigned to discourage at Dr. Jerica Goodwin so GE Local 2437. Kelly stated team members hated? No X Yes 1 Conciliation Service 1 Front Board 1 To Constitution Service 1	I to discourage and intimidate this Local membership within AFGE Local 2437. I lely based on her protected activity and to be released by the Agency on official to a compare the compact of the compac
askly, this acts represent continually retaliation and reprisal agains in husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don F Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the human procedure? Have you or anyone else raised this matter in any other procedure? Grievance Procedure Grievance Procedure	gotiations is an act aimed is designed to discourage at Dr. Jerica Gooodwin so GE Local 2437. Kelly stated team members hated? No Kelly 1 (2) E (3) Conciliation Service Constitution Board	I to discourage and intimidate this Local membership within AFGE Local 2437. It is based on her protected activity and to be released by the Agency on official to DI (4) DI (5) EI (6) DI (7) DI (8) DI (7) Fyes, where?
askly, this acts represent continually retaliation and reprisal agains husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don I Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the procedure? Srievance Procedure If Federal Mediation and Equal Employment Opportunity Commission If Merit Systems Protection Detection In Negotiability Appeal to DECLARATION	gotiations is an act aimed is designed to discourage at Dr. Jerica Gooodwin so GE Local 2437. Kelly stated team members hated? No X Yes 1 Conciliation Service 1 Fon Board 1 Control of the service 1 Constant of the service 1	I to discourage and intimidate this Local membership within AFGE Local 2437. Hely based on her protected activity and to be released by the Agency on official to D (4)口(5)回(6)口(7)口(8)口Fyes, where? The sederal Service Impasses Panel office of Special Counsel of ther
astly, this acts represent continually retaliation and reprisal agains of husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don F Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the husband of the procedure? Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the husband of the procedure? Grievance Procedure Equal Employment Opportunity Commission Other Administrative or Judicial Proceeding DECLARATION CLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN INTERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISFORMED.	gotiations is an act aimed sidesigned to discourage at Dr. Jerica Gooodwin so GE Local 2437. Kelly stated team members hated? No Kelly stated team members hated? Conciliation Service Fron Board FLRA Constitution Service FLR	I to discourage and intimidate this Local membership within AFGE Local 2437. Hely based on her protected activity and to be released by the Agency on official to ad to be released by the Agency on official to a compart of the compact of the comp
askly, this acts represent continually retaliation and reprisal agains husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don I Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the procedure? Have you or anyone else raised this matter in any other procedure? Grievance Procedure I Federal Mediation and Equal Employment Opportunity Commission I Merit Systems Protection Declaration of Judicial Proceeding I Negotiability Appeal to DECLARATION CLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN	gotiations is an act aimed a designed to discourage at Dr. Jerica Gooodwin so GE Local 2437. Kelly stated team members hated? No X Yes 1 Conciliation Service 1 Fon Board 1 C FLRA 1 C C TARE TRUE TO THE BEST OF THE BEST OF THE BY FINE AND IMPRISO all appropriate boxes]	I to discourage and intimidate this Loc membership within AFGE Local 2437. Iely based on her protected activity an ad to be released by the Agency on official to) 口 (4) 口 (5) 匣 (6) 口 (7) 口 (8) 口 Fyes, where? ederal Service Impasses Panel office of Special Counsel of ther FMY KNOWLEDGE AND BELIEF. NMENT, 18 U.S.C. 1001.
asely, this acts represent continually retaliation and reprisal agains in husband's, Dr. Gerald Goodwin, affiliation and position with AF in May 20,2015 during a brief meeting with Dr. Gerald Goodwin and I, Don I Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the procedure? Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has violated the procedure? Grievance Procedure Griev	gotiations is an act aimed sidesigned to discourage at Dr. Jerica Goodwin so GE Local 2437. Kelly stated team members hated? No X Yes I Conciliation Service I Fon Board I CELERA I C	I to discourage and intimidate this Local membership within AFGE Local 2437. Interpretate the second protected activity and to be released by the Agency on official to a second protected activity and to be released by the Agency on official to a second protected activity and to be released by the Agency on official to a second protected activity and to be released by the Agency on official to a second protected activity and to be released by the Agency on official to be released by the Agency on official to a second protected activity and to be released by the Agency on official to be released by the Age



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

	FOR FLRA USE OF	VLY
Case No.	DA-19-15-022	4

CHARGE AGAINST AN AGENO	Date Filed JUN 2 3 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) Dallas VAMC 4500 S. Lancaster Rd. Dallas, TX 75216	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PO Box 397960 Dallas, TX 75339
b. Agency Representative (include name, title, address) Wendell Jones (VISN 17 Director), Jeff Milligan (Dallas VAMC Director), Kendrick Brown (Associate Director, Dallas VA) 4500 S. Lancaster Rd. Dallas, TX 75216	b. Charging Party Representative (include name, title, address) Donald Burrell President, AFGE Local 2437 PO Box 397960 Dallas, TX 75339
tel. (214)857-1166 fax e-mail jeffery.milligan@va.gov	tel. (214)857-4500 fax (214)857-0077
3. BASIS OF THE CHARGE	e-mail donald.burrell@va.gov
Since on or about June 15, 2015 and at all times thereafter, Kend restrained, and coerced, and is interfering with, restraining, and of Section 7102 of the Federal Service Labor-Management Relations Kendrick Brown sent an email telling Dr. Gerald Goodwin that he then sent a subsequent email on June 15, 2015 giving Dr. Goodwin Although Dr. Goodwin informed Kendrick Brown that he was on of (KB) nor the agency had the authority to issue direct orders to un capacity as a representative on AFGE Local 2437, Kendrick Brown meet with him in his office. Additionally, the issuance of this direct participation, and negotiation of the Local Supplemental Agreement negotiation.	coercing its employees in the exercise of their rights guaranteed in a Statue, by the following acts and conduct: On June 15, 2015 needed to be in his office at 3pm for a meeting. Kendrick Brown in a direct order to be in his office at 3pm on June 15,2015. Official time for the entire week of June 15-19, 2014; therefore, he ion officials while they are on official time acting in their official still was insistent on issuing the direct order and requiring me to
Declare That I have read this Charge and That The Statements in Understand That Mediation and Declare That I have read this matter in any other procedure? □ Federal Mediation and □ Merit Systems Protect □ Negotiability Appeal to Declare That I have read this matter in any other procedure? □ Federal Mediation and □ Merit Systems Protect □ Negotiability Appeal to Declare That I have read this Charge and That The Statements in Understand That Making Will Fill I years Statements Canada.	No No Yes If yes, where? If Conciliation Service Federal Service Impasses Panel Ition Board Office of Special Counsel Other
UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNHIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check of the Person	ISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. ck all appropriate boxes]
Donald B.	June 17, 2015
Type or Print Your Name Your	Signature Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY Case No.

CHARGE ACTUAL AND	M-CH-15-0335
CHARGE AGAINST AN AGENC	JUN 2 3 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) Dallas VAMC 4500 S. Lancaster Rd. Dallas, TX 75216	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PO Box 397960 Dallas, TX 75339
b. Agency Representative (include name, title, address)	h Charrying Party Rosesonaidin (in)
Wendell Jones (VISN 17 Director), Jeff Milligan (Dallas VAMC Director), Kendrick Brown (Associate Director, Dallas VA) 4500 S. Lancaster Rd. Dallas, TX 75216	b. Charging Party Representative (include name, title, address) Donal d Burrell President, AFGE Local 2437 PO Box 397960 Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	,(==:/55/ 55/ /
3. BASIS OF THE CHARGE	e-mail donald.burrell@va.gov
Dr. Goodwin informed Kendrick Brown that he (KB) nor the agency they are on official time acting in their official capacity as a repressissuing the direct order and requiring me to meet with him in his conterfered with AFGE Local 2437's preparation, participation, and being negotiated at that time and is still under negotiation.	sentative on AFGE Local 2437, Kendrick Brown still was insistent on
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vio	lated? (1)回 (2)回 (3)口 (4)口 (5)口 (6)口 (7)口 (8)口
c. Have you or anyone else raised this matter in any other procedure? ☐ Grievance Procedure ☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal to	No ■ Yes □ If yes, where? d Conciliation Service □ Federal Service Impasses Panel tion Board □ Office of Special Counsel
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [chec	ck all appropriate boxes]
HIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [chec	ISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. ck all appropriate boxes]

Settlement 02/22/16

Compliance Pending



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

		LKA U	SE ONLY
Case No.	-CA-	15-	0346
Date Filed	11141	2.0	2045

JUN 3 0 2015

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY	
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)	
Dallas VAMC & VISN 17	AFGE Local 2437	
4500 S. Lancaster Rd.	PO Box 397960	
Dalias, TX 75216	Dallas, TX 75339	
,		
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)	
Wendell Jones, Jeff Milligan	Donald Burrell	
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437	
	PO BOX 397960	
	Dallas, TX 75339	
tol /314\057 1166		
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077	
e-mail jeffery.milligan@va.gov	e-mail donald.burell@va.gov	
3. BASIS OF THE CHARGE		
a. Set forth a clear and concise statement of the facts constituting the alleg	ed unfair labor practice, including date and location of the particular acts.	
Since on or about March 18, 2015, and at all times thereafter, VISN 17 and the Dallas VAMC, by its supervisors, officials, and/or agents Dr. Wendell Jones (VISN 17 Director) and Jeff Milligan (Director, Dallas VAMC), and Alan Bernstein (Associate Director, Patient Care Services) has failed to provide the exclusive representative with data requested by the Union concerning the membership of the Nursing Professional Standards Board thereby in violation of 7114(b)(4).		
	·	
•	•	
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vic	olated? (1) 🖪 (2) 🖂 (3) 🗀 (4) 🖂 (5) 🖹 (6) 🗀 (7) 🗔 (8) 🖻	
c. Have you or anyone else raised this matter in any other procedure?	No □ Yes □ If yes, where?	
☐ Grievance Procedure ☐ Federal Mediation an		
☐ Equal Employment Opportunity Commission ☐ Merit Systems Protec ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal (· · · · · · · · · · · · · · · · · · ·	
4. DECLARATION	O TOTAL CORRECT CONTRACTOR CONTRA	
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS II	N IT ARE TRUE TO THE REST OF MY KNOW! FDCE AND RELIEF	
I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUN	VISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.	
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [che	ck all appropriate boxes]	
In Person □ 1st Class Mail □ Fax □ Commerc	ial Delivery Certified Mail e-mail (see reverse)	
Donald Burrell Donald	B 14 2 0 6 5/18/2015	
Type or Print Your Name You	r Signature Date	

Popealed 12/23/15



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

	FOR FLRA USE ONLY		
	Case No. DA - CA - 15 - 0347		
i	Date Filed		

CHARGE AGAINST AN AGENO	CY JUN 3 0 2015
AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZiP)
Dallas VAMC & VISN 17	AFGE Local 2437
4500 S. Lancaster Rd,	PO Box 397960
Dallas, TX 75216	Dallas, TX 75339
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Wendell Jones, Jeff Milligan	Donald Burrell
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437
	PO BOX 397960
	Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	e-mail donald.burell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the all	eged unfair labor practice, including date and location of the particular acts.
contract employees at the Dallas VAMC thereby in violation of 7	niring of contract employees and the associated processes of hirin 114(b)(4).
·	
	1
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has v	iolated? (1) ■ (2) □ (3) □ (4) □ (5) ■ (6) □ (7) □ (8) ■
Have you or anyone else raised this matter in any other procedure?	No □ Yes □ If yes, where?
	nd Conciliation Service
Equal Employment Opportunity Commission	ection Board
DECLARATION	LI OTHE
ECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS	
A PROTECTION A A DESCRIPTION A A DESCRIPTION A A DESCRIPTION A DESCRIPTI	IN IT ARE TRUE TO THE REST OF MAY PROMUTOGE AND BOUTE
NDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PU S CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [ch	NISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.

☐ Commercial Delivery

Your Signature

☐ Certified Mail

Form Exempt Under 44 U.S.C. 3512

☐ 1st Class Mail

Donald Burrell

Type or Print Your Name

□ Fax

■ In Person

5/18/2015

e-mail (see reverse)



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY Case No.

Date Filed

	JUN 3 U ZUI3
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC & VISN 17	AFGE Local 2437
4500 S. Lancaster Rd.	PO Box 397960
Dallas, TX 75216	Dallas, TX 75339
Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Wendell Jones, Jeff Milligan	Donald Burrell
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437
	PO BOX 397960
	Dallas, TX 75339
ol /214\0077.11cc	
el. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
mall jeffery.milligan@va.gov	e-mail donald.burell@va.gov
. BASIS OF THE CHARGE	
Set forth a clear and concise statement of the facts constituting the	e alleged unfair labor practice, including date and location of the particular acts.
730am-400pm to that of 5am-130pm instead of allowing him	to return to his previous position and grade because of his to return to his previous position and grade because of his retaliated and engaged in reprisal against Mr. Mohan for having
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency ha	as violated? (1) ① (2) ① (3) □ (4) □ (5) □ (6) □ (7) □ (8) □
Have you or anyone else raised this matter in any other procedur	
·	rre? No□ Yes□ If yes, where? on and Conciliation Service □ Federal Service Impasses Panel
Equal Employment Opportunity Commission	' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '
Other Administrative or Judicial Proceeding	peal to FLRA Other
DECLARATION	
ECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMEN NDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE	NTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. E PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.
S CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY	
	mercial Delivery Certified Mail e-mail (see reverse)
Donald Burrell Donner	5/18/2015
	Your Signature Date



FOR FLRA USE ONLY Case No.

CHARGE AGAINST AN AGENCY Date Filed

	JUN 3 U 2015		
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY		
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)		
Dallas VAMC & VISN 17	AFGE Local 2437		
4500 S. Lancaster Rd.	PO Box 397960		
Dallas, TX 75216	Dallas, TX 75339		
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)		
Wendell Jones, Jeff Milligan	Donal d Burrell		
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437		
	PO BOX 397960		
·	Dallas, TX 75339		
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077		
e-mail jeffery.milligan@va.gov	e-mail donald.burell@va.gov		
3. BASIS OF THE CHARGE			
a. Set forth a clear and concise statement of the facts constituting the alle	ged unfair labor practice, including date and location of the particular acts.		
having engaged in activities protected by the Statue, and due to hengaged in activities protected by the Statue. To my knowledge, contacting in this manner and for the same purpose.	ner husband's affiliation with AFGE Local 2437 and his having no other AFGE Local 2437 officers' or stewards' supervisors were		
	·		
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vi	olated? (1) 🗷 (2) 🖹 (3) 🗆 (4) 🗖 (5) 🗖 (6) 🗖 (7) 🗖 (8) 🗆		
c. Have you or anyone else raised this matter in any other procedure?	No □ Yes □ If yes, where?		
☐ Grievance Procedure ☐ Federal Mediation al ☐ Equal Employment Opportunity Commission ☐ Merit Systems Prote			
☐ Equal Employment Opportunity Commission ☐ Merit Systems Protein ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal	,		
4. DECLARATION			
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PU	IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. NISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001		
HIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [che			
☐ In Person ☐ 1st Class Mail ☐ Fax ☐ Commerc	· · · · · · · · · · · · · · · · · · ·		
Donald Burrell	5/18/2015		
Type or Print Your Name You	r Signature Date		



Case No. DA - CA - 15 - 0350

Date Filed

JUN 3 0 2015

CHARGE AGAINST AN AGENCY

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY		
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)		
Dallas VAMC & VISN 17	AFGE Local 2437		
4500 S. Lancaster Rd.	PO Box 397960		
Dallas, TX 75216	Dallas, TX 75339		
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)		
Wendell Jones, Jeff Milligan	Donald Burrell		
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437		
	PO BOX 397960		
	Dallas, TX 75339		
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077		
e-mail jeffery.milligan@va.gov	e-mail donald.burell@va.gov		
3. BASIS OF THE CHARGE			
a. Set forth a clear and concise statement of the facts constituting the alleg	ged unfair labor practice, including date and location of the particular acts.		
refused to consult or negotiate concerning personnel policies, pra with AFGE Local 2437 by engaging in acts and conduct involving b Mr. Samuel Mohan into changing his tour of duty from 730-1600 Local 2437, thereby engaging in an act to undermine the status of	ypassing the Union and attempting to negotiate and pressuring to 500-1300 without prior notification to or negotiating with AFGE		
	'		
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vio	plated? (1) ■ (2) ■ (3) □ (4) □ (5) □ (6) □ (7) □ (8) □		
c. Have you or anyone else raised this matter in any other procedure?	No □ Yes □ If yes, where?		
☐ Grievance Procedure ☐ Federal Mediation as	nd Conciliation Service		
☐ Equal Employment Opportunity Commission ☐ Merit Systems Protect ☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal			
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal 4. DECLARATION	to FLRA Other		
	N IT ARE TRUE TO THE REST OF MAY KNOW! EDGE AND BELLEE		
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.			
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]			
■ in Person □ 1st Class Mail □ Fax □ Commerc	11 1		
Donald Burrell	Bune 5/18/2015		
Type or Print Your Name You	r Signature Date		



CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY

Case No. DA - CA - 15 - 0351

Date Filed

JUN 3 0 2015

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY		
a. Name of Charged Agency (include address, city, state, & ZIP)			
	a. Name of Charging Party (include address, city, state, & ZIP)		
Dallas VAMC	AFGE Local 2437		
4500 S. Lancaster Rd	PO BOX 397960		
Dallas, TX 75216	Dallas, TX 75339		
(214)857-1166	(214)857-4500		
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)		
Jeff Milligan	Donald Burrell		
Dallas VAMC Director	President, AFGE Local 2427		
4500 S. Lancaster Rd	PO BOX 397960		
Dallas, TX 75216	Dallas, TX 75339		
(214)857-1166	(214)857-4500		
tel. fay			
IMA	tel. (214)857-4500 fax (214)857-0077		
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov		
3. BASIS OF THE CHARGE			
a. Set forth a clear and concise statement of the facts constituting the alleg	ed unfair labor practice, including date and location of the particular acts.		
or negotiate in good faith concerning matters affecting working corefusing to honor the negotiated official time granted to Dr. Jerica Local 2437's negotiation team for the Local Supplemental Agreem bargaining and repudiated an agreement (Ground Rules for Negotiationally, the Dallas VAMC refusal to honor the Ground Rules for have all members of its Negotiation team available for contract neand Dr. Jerica Goodwin solely based on her protected activity and Lastly, this acts represent continually retaliation and reprisal again her husband's, Dr. Gerald Goodwin, affiliation and position with Affiliation and position with Affiliation and position with Affiliational Contract of the c	Goodwin as a team member and alternate member of AFGE ent (LSA). Additionally, the Dallas VAMC has exhibited bad faith lation of the LSA) reached with AFGE 2437 on April 10, 2014. Or Negotiation of the LSA thereby disabling the Union's ability to gotiations is an act aimed to discourage and intimidate this Local is designed to discourage membership within AFGE Local 2437. St Dr. Jerica Gooodwin solely based on her protected activity and		
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vio	lated? (1) 1 (2) 1 (3) 1 (4) 1 (5) 1 (6) 1 (7) 1 (8) 1		
c. Have you or anyone else raised this matter in any other procedure?	No □ Yes □ If yes, where?		
☐ Grievance Procedure ☐ Federal Mediation an			
☐ Equal Employment Opportunity Commission ☐ Merit Systems Protec			
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal t	o FLRA Other		
4. DECLARATION			
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]			
■ In Person □ 1st Class Mail □ Fax □ Commercial Delivery □ Certified Mail ■ e-mail (see reverse)			
Donald Burrell Danuel 1	May 20, 2015		
Type or Print Your Name Your	Signature Date		

Dismissed 12/01/15

Form Exempt Under 44 U.S.C: 3512

Fixel: Fixel: (214) 202-1407 3. Charged Labor Organization Contact Information 4. Charging Purity Contact Information Name: Densid Burrel Name: President, AFGE Local 2437 Notifies: President, AFGE Local 2437 Notifies: 4500 South Lancauter Road, Dates, Texas 75216 Address: 4500 South Lancauter Road, Ontes, Texas 75216	UNITED STATES OF AMERICA		FOR FLRA USE ORLY		
Date Filed	FEDERAL LABOR RELATIONS AUTHORITY		TY	Carson No. TA - C	7 15 15 15
Contrades instructions are on the hack of this force. Changed Labor Organization Design Labor Organization ACC Contrades Proper labor Organization, Activity, or Agency Modernes; 4500 Seath Lucrosetor Road, Dallam, Texas 75216 ACC Contrades Proper labor Organization, Activity, or Agency Modernes; 4500 Seath Lucrosetor Road, Dallam, Texas 75216 ACC Contrades Proper labor Organization Contrades Information Name: Department of Volatoran Affairs (02) Activities, 1400 Seath Lucrosetor Road, Dallam, Texas 75216 Text. (214) 857-1056 Ec. Fact. (214) 857-1058 Ec. Fact. (214) 857-1058 Ec. Fact. (214) 857-0074 Ect. Text. (200 Seath Lucrosetor Road, Dallam, Texas 75216 ACC Text. (200 Seath Lucrosetor Road, Dallam, Texas 75216 ACC Text. (200 Seath Lucrosetor Road, Dallam, Texas 75216 Text. (214) 857-0074 Ect. Text. (214) 857-0074 Ect. Text. (214) 857-0074 ACC			TION		
Charging Party (antividual, Labor Organization, Activity, or Agency) Name: AFGE, Lock 2437 Name: C141 857-0074 Ext. Test. (214) 857-1658 Ext. Fact. Compared Labor Organization Contact Information Name: Department of Valuation AFGE Lock 2437 Name: C240 857-1658 Ext. Test. (214) 857-1659 Ext. T		at a star of the book of the form	····	101 2	8_2015
Netwer: AFGE, LDCRI 2437 Holoses: ASD Goods Lucrositer Road, Dallan, Texas 75216 Field: (214) 857-0074 Ext. Total 2, (214) 857-0074 Ext. Total 2, (214) 857-0074 Ext. Total 2, (214) 857-0074 Ext. Company June Organization Contact Information None: Donated Burnel Title: President, AFGE Local 2437 Nationated 9000 South Lucrositer Road, Dallan, Texas 75216 Title: Q14) 857-0074 Ext. (214) 857-0074 Ext. (214) 857-0074 Ext. (214) 857-0074 Ext. (214) 857-0076					
Activated: 4500 Brouth Lancounter Road, Dathar, Texasa 75216 Fold: (214) 857-0074		. •			
To size (214) 857-0074 Ext. To size (214) 857-1056 Ext. To size (214) 857-1056 Ext. Compared Lathor Organization Connect Information A. Compared Lathor Connect Information Title: Staff Alborracy, DVA Address: 4900 Societ Laurosane Road (02), Dales, Taxon 72216 Total. Ext. 214) 857-1058 Ext. 2143 3020-1497 Total. Ext. 2143 3020-1497 Total. Ext. 2143 857-1058 Ext. 2143 3020-1497 Total. Ext. 2143 857-1058 Ext. 2143 3020-1497 Total. Ext. 2143 857-1058 Ext. 2143 3020-1497 Total. Ext. 2144 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2144 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2144 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2144 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2144 3020-1497 Ext. 2145 857-1058 Ext. 2143 3020-1497 Ext. 2144 3020-1497 Ext. 2145 857-1058 Ext. 2147 857-1058 Ext. 2147 857-1058 Ext. 2147 857-1058 Ext. 2147 857-1058 Ext. 2143 857-1058 Ext. 2144 857-1058 Ext. 2144 857-1058 Ext. 2145 8				•	
Execution Chief Mayor of Service House Consider in many other processions of Vice-President, Region 17. Vice-President Services (Note Consider President Services (Note Consider President Services) (Note Consider Services) (Note Consider) (Note Consider Services) (Note Consider) (Note Con	PRESIDENCE CONTRACTOR	section of White or depositions and analysis of the section of the			
Name: Conside Burnel This: President, AFGE Local 2437 National Total Control C	Ters: 521	4) 857-0074 Ext.		the same same	r.
Title: Staff Allomery, DVA Address: 4900 South Lancester Road (DL) Dates, Tatas 75218 Tel R: (214) 857-074 Ext. (214) 857-074 Ext. (214) 857-075 S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree server violated? (See reverse) S. USC 7116(b)(5) *** S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree server violated? (See reverse) S. USC 7116(b)(5) *** S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree server violated? (See reverse) S. USC 7116(b)(5) *** S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree server violated? (See reverse) S. USC 7116(b)(5) *** S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree server violated? (See reverse) S. USC 7116(b)(5) *** S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree server violated? (See reverse) S. USC 7116(b)(5) *** S. Which sussection(s) of SULE.C. 719(b) serior (s) do you believe tree than 50 percent by Donald Kelly, Chief Negotistor for Visionane Reverse Network, Region 17; Visionane Cartison Secretion, Collision, Texture; DVA Condition of Network (See reverse), Concess and DVA Dallace Fort Worth Netherland Control of See vision Network, Region 17; Visionane Cartison Secretor, Concess (See Vision Secretor), Donald Secretor,	3. Crueyed Lab	or Organization Contact Information	4. Chargi	ng Party Contract Information	
Address: 4900 South Lancaster Road, Dates, Tessas 75216 Tel.R. (214) 857-0074 Ed. Tel.R. (214) 857-0074 Ed. Tel.R. (214) 857-0074 Ed. Tel.R. (214) 857-0075 S. Which subsection(s) of S.U.S.C. 7/18(b) smillor (c) do you believe have been violated? (See revenue) S.U.S.C. 7/18(b) Smillor (c) do you believe have been violated? (See revenue) S.U.S.C. 7/18(b) Smillor (c) do you believe have been violated? (See revenue) S.U.S.C. 7/18(b) Smillor (c) do you believe have been violated? (See revenue) S.U.S.C. 7/18(b) Smillor (c) do you believe have been violated? (See revenue) S.U.S.C. 7/18(b) Smillor (c) do you believe have been violated? (See revenue) S.U.S.C. 7/18(b) Smillor stems of the smillor of smillor of settlement and one own professor of settlement and one own professor of settlement settlement set integrated Services Network, Region 17, Veterance Continue Service, Dollars, Texas: DVA Donatid Stems, I british CLP and DVA Debis of See Settlement is filed against Richard Shew, Unition Vice-President, Donated Stems, I british Network Cernsteny. This U.P. and breach of settlement is filed against Richard Shew, Unition Vice-President, Donated Stems, I british agreement with the Against I british Uniting collective bargaining prepotestors over a local supplemental spreamment with the Against J british the Against the settlement of the surface of settlement of settlement settlement and signed letter, Richard Shew, Unition Vice-President, Edward Shew with the procure segment of the surface of settlement settlement segment of settlement segment settlement segment segment of settlement segment s					Donaid Kelly)
S. Which authention(s) of S.U.S.C. 7116(b) and/or (c) do you total even through (for revenue). S. U.S.C. 7116(b) 1814 Title coachy WHX fine letter or aperization dist. Blant with the DRTE and LOCATICN, state WHO was rendwed, including them. This is field as a U.L.P., and a non-compliance and breach of settlement by Donald Keely, Chief Negotiator for Veterans Affairs North Texas Health Care Systems infragranted Services Network, Region 17; Veteranse Carstein Services, Dallas, Texas; DVA Controllulated Mark Dutpabler (Pharmacy, Lencaser, Texaser, U.A. Controllulated Mark Dutpabler (Pharmacy), Lencaser, Texaser, and DVA Dallas-Fort Worth Incompliance Services, Dallas, Texase; DVA Controllulated Mark Dutpabler (Pharmacy), Lencaser, Card Controllulated Mark Mark Dallas (Pharmacy), Lencaser, and DVA Dallas-Fort Worth Incompliance Card Research (Pharmacy), Lencaser, and DVA Dallas-Fort Worth Incompliance Card Research (Pharmacy), Lencaser, Lencas					allene, Theorem 75218
S. Which assessition(s) of SUEC. 7118(b) employ (c) do year balless have been violated? (See reverse). B. Tall exactly WHXT the later organization did. Start with the DXTE and LOCATICK, state WHO was rendwed, including Blow. This is field as a U.P., and a non-compliance and breach of settlement agreement by Donald Kelly. Chief Negotiator for Visionane Affairs North Toxas Heelth Care System; Visionane Interpreted Services Network, Region 17; Visionane Centeen Services, Dallas, Texas; DVA Consolicated Mell Outpubler Pharmacy, Lencarian,		14) 857-0074 Ed.			a,
B. Tall excitify WPAT the lateor experimenter old. Start with the DATE and LOCATION, state WAPO was involved, including titles. This is filed as a ULP, and a non-compliance and breach of settlement appreament by Donald Kelly, Cheff Negotiator for Visionars Interpreted Services. Network, Region 17; Vestrans Centreen Service, Delias, Texaer, DVA Consolidated Mell Outpetient Pharmacy, Lencarier, Texaer, and DVA Deliae-Fort Worth Neticnal Centreers, Texaer, DVA Consolidated Mell Outpetient Pharmacy, Lencarier, Texaer, and DVA Deliae-Fort Worth Neticnal Centreers, Texaer, DVA Consolidated Mell Outpetient Pharmacy, Lencarier, Texaer, and DVA Deliae-Fort Worth Neticnal Centreers, and Geny Morrisor. Under Centreers and Mell Centreers and DVA Deliae-Fort Worth Neticnal Centreers, and Geny Morrisor. Under Centreers and Mell Centreers and Mell Centreers and Centreers		ction(s) of 5 U.S.C. 7118(b) panelfor (c) do your ballows have be			(5) ···
This is filed as a ULP, and a non-compliance and breach of settlement agreement by Donald Kelly, Chief Negotiator for Valerans Affairs North Texas Health Care System; Valerans Integrated Services Network, Region 17; Valeranse Carriese Services Network, Region 17; Valeranse Carriese Services Network (Region 17; Valeranse Carriese Services). Delicated Carriese Services Network (Region 17; Valeranse Carriese Services). Delicated Carriese Services Network (Region 17; Valeranse Carriese Services). This ULP and breach of settlement is filed against Richard Shaw, Union Vice-President, Donald Burrell, Union President, and Gery Northrect, Union Chief Negotiators. By a settlement in Du. CD-16-0010, dated April 29, 2015, the Union agreed little transfer for beginning to chaddle uncertage to constitute repositions to the transition make the April 29, 2015, the union agreed little transfer repositions to the tellular president president president, George Manufacture, Union Chief Negotiator, and Donald Burrell, Union President, George Manufacture, Union Chief Negotiator, and Donald Burrell, Union President, George Manufacture, Union Chief Negotiator, and Donald Burrell, Union President, George Manufacture, Union Chief Negotiator, and Donald Burrell, Union President, George Manufacture, Union Chief Negotiator, and Donald Gourneste. 7. Hear you or reportedate related bis reside in may other procedure? May a value of the ground relate and in violation of the referenced settlement agreement. See attached documents. 8. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY SHOWLEDGE AND BELLET, I BUGGESTAND THAT HAVE READ THAT DESCRIPTION BUSGEST OF MY SHOWLEDGE AND BELLET, I BUGGESTAND THAT HAVE READ THAT DESCRIPTION BUSGEST OF PROCESS OF MY SHOWLEDGE AND Communical Carries and Carries					72
Affairs North Texas Health Cere Systems (Veterrans Interpreted Services Network, Region 17; Veterranc Certeren Service, Callas, Texas; DVA Consolidated Mell Outpatient Prestrucy, Lancaster, Texas; and DVA Delias-Fort Worth National Ceraminy. This ULP and breach of settlement is filed against Richard Shaw, Union Vice-President, Donald Burnell, Union Presiden, and Gery Martinez, Union Chief Negotiator. By a settlement in DA-CD-15-0010, deted April 29, 2015, the Union agreed that it would not bergain in bad faith during collective bargaining repotissions over a local supplemental systement with the Agency by refusing or failing to certedular restings to confirme regionalisms on the faith during collective bargaining repotissions over a local supplemental systement with the Agency by refusing or failing to certedular restings to confirme regionalisms on by failing to meet, in accordance with pround rules generated. On this 24, 2015, wile email and eigned letter, Richard Shew, Union Vice-President, Gury Martinez, Union Chief Negotiator, and Donald Burrell, Union President, refused to resume regionalisms in violation of the ground rules and in yielastion of the referenced settlement agreement. See effected documents. 7. Heavy you or reporte eleas released bits restair in may other procedure? Size Year Type, where? Issue researed. 8. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRIZE TO THE BEST OF MY KNOWLEDGE AND BELLET. I BURGESTAND THAT MAINING WILLIALLY FALSE STATEMENTS IN IT ARE TRIZE TO THE BEST OF MY KNOWLEDGE AND CONTINUED CONTINUED BY INCOMPRESSED BY FINE AND IMPRISONMENT, 16 U.S.C. 10. THEORY OF THAT I HAVE READ THAT SHADE AND THAT THE STATEMENTS IN IT ARE TRIZE TO THE BEST OF MY KNOWLEDGE AND CONTINUED CONTINUED BY INCOMPRESSED BY FINE AND IMPRISONMENT, 16 U.S.C. 10. THEORY OF THE ADDRESS OF SERVED CHITCH PERSON RESTITUTED BY THE STATEMENTS CAN BE PLANSABLED BY FINE AND IMPRISONMENT, 16 U.S.C. 10. THE OFFICE AND THAT AND THAT AND THAT THE STATEMENTS CAN BE PLANSABLED BY FI					
This ULP and breach of entitlement is filed against Richard Staw, Union Vice-President, Donald Burnell, Union President, and Gery Markinez, Union Chief Negotistor. By a settlement in DA-CD-15-0010, detect April 29, 2015, the Union agreed that it would not bergain to be faith suring collective bergaining negotisticities over a local supplementable greenment with the Agency by refusing or failing to school the residue meetings to constitute engagement or only the pround rules agreement. On July 24, 2015, via email and eigned letter, Richard Staws, Union Mos-President, Garly Marthers, Union Chief Negotistor, and Donald Burrell, Union President, refused to return negotistions in violation of the ground rules and in violation of the referenced settlement agreement. See afteched documents. 7. Have you or imported the related this resider in my other procedure? 8.1 DECLARE THAT I HAVE READ THIS CHARCE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF My KINCKLEDGE AND RELIEF, I Lancerstand That Markins and Markins (I lancerstand That Markins Charles Statements) and President Delivery Corphied seals Donald Kelliy Donald Kelliy Donald Kelliy	Affairs North 7	soms Health Care System; Veterans Interpreted Ser	vicas Netwo	rk, Region 17; Veterane Canti	een Service, Calles,
Nertimez, Union Chief Negotistor. By a settlement in DA-CC-15-0010, debed April 29, 2015, the Union agreed that it would not bergain in bad fall during colorable bargaining negotistions over a local supplemental synement with the Apency by refusing to falling to schedule meetings to confirm expositions or by felling to meet, in accordance with the pround rules egreement. On July 24, 2015, vie email and algored letter, Richard Stiere, Union Nice-President, Gury Mantheut, Union Chief Negotistor, and Donald Burrell, Union President, refused to resume regionistions in violation of the ground rules and in violation of the referenced settlement agreement. See attached documents. 7. Hears you or reported the tribial this resides in any other procedure? 8. I DECLARE THAT HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TIME TO THE BEST OF MY KNOWLEDGE AND RELIEF, I LINGERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSAGE AND STATE AND INTO CHARGE WAS SERVED ON THE PRESONNEST RESIDENCES IN IT ARE TIME TO THE BEST OF MY KNOWLEDGE AND Commissional Dislinary Donald Kelly Donald Kelly	Textes; DVA C	onsoliciated Meil Outpotient Pharmacy, Lancaster.	Texas: and	DVA Daline-Fort Worth Nation	ned Centreliery.
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill	Martinez, Union Chief Negotiator. By a settlement in DA-CO-15-0010, detect April 29, 2015, the Union agreed that it would not begain in bed fath during collective bargaining negotiations over a local supplemental agreement with the Agency by refusing or belief to schedule meetings to continue negotiations or by telling to meet, in accordance with the pround rules egreement. On July 24, 2015, vie email and algred letter, Fichsert Shew, Union Vice-President, Garly Martinez, Union Chief Negotiator, and Dorold Burrall, Union President, refused to resume negotiations in violation of the ground rules and in violation of the referenced settlement				
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill		•			
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill	İ				
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill	1				•
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill			•		
B. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, I LINDERSTAND THAT MAKING WILL FULLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPRISORMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 83 BY (preck X bow) Fax 18 Clear Making In Person Converged to Delivery Confident Making Dec. 12 Bill Clear Making I Dec. 13 Bill Clear Making I Dec. 14 Bill Clear Making I Dec. 15 Bill					
BELIEF, I LINDERSTAND THAT MAKING WILL FLALLY FALSE STATEMENTS CAN BE PLANSHED BY FINE AND IMPROSORMENT, 18 U.S.C. 1001, THIS CHANGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 43 BY (onect. Y bow) Fax 1st Clear Making In Person Commission Districts Dis	7, House you or empores often released this resident in may other proceedure? XNO Yes: 11 year, where? [250 (500000)]				
The state of the s	BELIEF, I UNICERSTAND THAT MAKING WILLIFULLY FALSE STATEMENTS CAN BE PLAKSHED BY FINE AND IMPROSORMENT, 18 U.S.C. 1001. THIS CHANGE WAS SERVED ON THE PERSON ICENTRY ED IN BOX BY TOYACK "Y" box! Fax: 1st Clear Mail m Person				
Types or Print Your Name Your Supraises Date			ed Ke	lly . I	28/15
	Type or	Price Your Name You	r Sagranue		<u>Date</u>

FLRA Form 23 (Rev. 1/98

Form Exempl Under 44 U.S.C. 3512



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY

Case No. DA CA IE 0280

CHARGE AGAINST AN AGENCY		141-C4-15-0567	
		NC Y	Date Filed
Complete instructio	ns are on the back of this form.		
1. Charged Activity Name: Readjustmer Address: 4500 S. Lani Dallas, TX 7 Tet.#: (214) 85	nt Counseling Center, North Texas VHCS caster Rd. 75216	Name: AF	ing Party (Labor Organization or Individual) FGE Local 1972 3807 Maywood Street, Alexandria, LA (318) 466-2705 Ext.
Fax#;		Fax#:	(318) 483-5067
3. Charged Activit Name: Gregory Bur Title: Deputy Region Address: Tel.#:		Name: Ber Title: Uni	ping Party Contact Information on Johnson bion President 3807 Maywood Street (318) 730-1442 Ext.
Fex#;	EAL.	Fax#:	(318) 730-1442 Ext. (318) 483-5067
5. Which subsection(s	of 5 U.S.C. 7116(a) do you believe have been vi	olated? [See rever	erse) (1) and <u>(2)</u>
On July 24, 2015, the request to add a four email, requesting acchange, is a change Noten referenced in The Union later lear notice. It is the Union's possistatutory right to pre BUEs. It is also the It is the Union's pos (5) and has committed consequently meeting by-pass is a violation of the bargaining unconsult as long as the subject of an Noten's non-responsing agency "to negotiate not prohibited by law available;3) Necessis bargaining; and 4) A relating to bargaining presence ultimately harm to employees excluded the Union of 5 USC 7116 (a) ("any right under this owith hiring, tenure, p	ir of duty for BU employees assigned to the dilitional information regarding a proposed to in working conditions for BU employees, her email. Ined that Ms. Noten sent a change for tour interest in the management of statute: § 7117, which stipulates that the interest interest of the management of statute: § 7117, which stipulates that the interest of the management of statute: § 7117, which stipulates that the interest of the management of statute: § 7117, which stipulates that the interest of the management of statute: § 7117, which stipulates that the interest interest of the request for information is a single or regulation only if the rule or regulative or information is a single of the management of	Vet Center Mana ever Center. Of tour change. The In addition, the request to fiscal tactics and unrests and to barging to easily exactic tactics and to barging to easily exactic tactics and to barging working conditions working conditions and Government of Society of the agency in the Union in proceeding the Union in proceeding to exact the Union in proceeding to exact the Union in proceeding the Union in proceeding the Union in proceeding to exact the Union in proceeding the Union in proceeding the Union in the Union in the Union in the Union in proceeding the Union in the Uni	nagement Official, Ms. Elizabeth Nolen regarding a Dn July 27, 2015 the Union provided Ms. Nolen with an the Union further in formed Ms. Nolen that a tour of duty a Union requested a copy of the National Directive, Ms. all services while removing the Union from the routing responsiveness to deter the Union from exercising its pain in good faith and duty to consult on behalf of the send a chilling effect throughout the bargaining. Of Gregory Burt, did intentionally violated § 7116 (a) (1) sulting and negotiating with the Union and ions. Subsequently, the direct consequences of the to provide the Union, as the exclusive representative regards to a) compelling need; (as well as a) duty to imment-wide rule or regulation, extend to matters which covernment-wide rule or regulation." Likewise, Ms. 7114(b)(4), which stipulates that it is the duty of the reclusive representative, upon request and, to the extent the regular course of business; 2) Reasonably intelligence of subjects within the scope of collective ing provided for management officials or supervisors, re-decisional involvement, thus the lack of Union ganization. Subsequently, the Union asserts that the exercise the appropriate duty of care when she are arbitrary and capricious tactics are a direct violation herce any employee in the exercise by the employee of any labor organization by discrimination in connection
BELIEF, I UNDERSTA 1001, THIS CHARGE V Commercial Deliv	AND THAT MAKING WILLFULLY FALSE STATE VAS SERVED ON THE PERSON IDENTIFIED IN BO	MENTS CANVBE	
Ben Johnson		11 000	07/31/2015
Type or Print You	rr Name	ur Signature	Date



CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY			_				
Case No.	DA	-CA		5	- > -	0456	_
Date Filed		SEP	0	4	201	5	-

1. AGENCY AGAINST WHICH CHARGE IS BROU	GHT 2. CHARGING PARTY		
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)		
Dallas VAMC & VISN 17	AFGE Local 2437		
4500 S. Lancaster Rd. Dalias, TX 75216	PO Box 397960 Dallas, TX 75339		
Danas, IX 73210	Dalles, IX 73333		
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)		
Wendell Jones, Jeff Milligan	Donald Burrell		
VISN 17 Director & Dallas VAMC Director	President, AFGE Local 2437		
	PO Box 397960 Dallas, TX 75339		
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077		
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov		
3. BASIS OF THE CHARGE			
a. Set forth a clear and concise statement of the facts cons	ituting the alleged unfair labor practice, including date and location of the particular acts.		
	eafter, the Dallas VAMC, by its supervisor, official, and/or agent, Dr. Wendell		
-	Dallas VAMC) has failed to provide the exclusive representative with data		
	Don Kelly and Ms. Frankie Manning for the purpose of assisting the agency greement thereby being in violation of 7114(b)(4). This information is relevant		
to the Unions's function as exclusive representative	•		
·			
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe ti	ne Agency has violated? (1) (2) (3) (4) (5) (6) (6) (7) (8) (8		
c. Have you or anyone else raised this matter in any oth	er procedure? No 🗆 Yes 🗀 If yes, where?		
	ral Mediation and Conciliation Service		
	tiability Appeal to FLRA		
4. DECLARATION			
	E STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.		
I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]			
■ In Person □ 1st Class Mail □ Fax	☐ Commercial Delivery ☐ Certified Mail ☐ e-mail (see reverse)		
Donald Burrell	and British () 27 August 15		
Type or Print Your Name	Your Signature Date		



FOR FLRA USE ONLY Case No.

CHARGE AGAINST AN AGENCY Date Filed

	SEP 0 4 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC & VISN 17	AFGE Local 2437
4500 S. Lancaster Rd.	PO Box 397960
Dallas, TX 75216	Dallas, TX 75339
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Wendell Jones, Jeff Milligan	Donald Burrell
VISN 17 Director & Dallas VAMC Director	President, AFGE Local 2437 PO Box 397960
	Dallas, TX 75339
,	
tel. (214)857-1166 fax	tel (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the allege	ed unfair labor practice, including date and location of the particular acts.
Since on or about July 24, 2015 and August 13, 2015, and at all tim agent, Dr. Wendell Jones (VISN 17 Director) and Jeff Milligan (Director) and Jeff Milligan (D	ctor, Dallas VAMC) has failed to provide the exclusive iring of Dr. Clark Gregg thereby being in violation of 7114(b)(4).
this mornation is relevant to the official s function as exclusive rep	Jiesentative.
	,
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has viol	lated? (1) 回 (2) 口 (3) 口 (4) 口 (5) 回 (6) 口 (7) 口 (8) 回
c. Have you or anyone else raised this matter in any other procedure? Grievance Procedure Grederal Mediation and	No□ Yes□ If yes, where?
☐ Grievance Procedure ☐ Federal Mediation and ☐ Equal Employment Opportunity Commission ☐ Merit Systems Protect	•
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal to	• ,
4. DECLARATION	
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUN	
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [chec	
In Person □ 1st Class Mail □ Fax Commercia	al Delivery ☐ Certified Mail ☐ e-mail (see reverse)
Donald Burrell Donald Bu	urrell (SZ) 27 August 15
Type or Print Vaux Name	CO.



CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY		
Case No. DA - CA - 15 - 0458		
SEP 0 4 2015		

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY		
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (inc	lude address, city, state, & ZIP)	
Dallas VAMC & VISN 17	AFGE Local 2437		
4500 S. Lancaster Rd.	PO Box 397960		
Dallas, TX 75216	Da Ilas, TX 75339		
b. Agency Representative (include name, title, address)	b. Charging Party Representativ	ve (include name, title, address)	
Wendell Jones, Jeff Milligan	Donald Burrell		
VISN 17 Director & Dallas VAMC Director	President, AFGE Local 24	137	
	PO Box 397960 Dallas, TX 75339		
	Dunas, (17555)		
tel. (214)857-1166 fax	tel. (214)857-4500	fax (214)857-0077	
e-mail jeffery.milligan@va.gov	e-mail	donald.burrell@va.gov	
3 BASIS OF THE CHARGE	i kaj lipis je potravi se koje i se vivi proje Li Jerovi i i di Steljus de vrida, i disa se		
a. Set forth a clear and concise statement of the facts constituting the a	lleged unfair labor practice, includ	ing date and location of the particular acts.	
Since on or about August 10, 2015, and at all times thereafter,	the Dallas VAMC, by its super	rvisor, official, and/or agent, JDr.	
Wendell Jones (VISN 17 Director), Jeff Milligan (Director, Dallas			
Miller (HR, labor relations) have refused to consult or negotiate	-	• •	
AFGE Local 2437, as exclusive representative, by unilaterally che obligation regarding the change in working conditions of ortho			
Bidg 2, 8th floor.	pedic personner by relocating	Grinopedics from Blug 2, 5th Boor, to	
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency ha	s violated? (1) ■ (2) □ (3	3) 🗆 (4) 💷 (5) 🖲 (6) 🖂 (7) 🖂 (8) 🖂	
c. Have you or anyone else raised this matter in any other procedur		If yes, where?	
☐ Grievance Procedure ☐ Federal Mediatic ☐ Equal Employment Opportunity Commission ☐ Merit Systems Pr		Federal Service Impasses Panel Office of Special Counsel	
☐ Other Administrative or Judicial Proceeding ☐ Negotiability App		Other	
4. DECLARATION			
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMEN UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE			
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 16 BY	[check all appropriate boxes]		
■ In Person □ 1st Class Mail □ Fax □ Comi	nercial Delivery	d Mail 🔳 e-mail (see reverse)	
Donald Burrell	Brunnell (BZ)	27 August 15	
	Your Signature	Date	
Form Everynt Under AAUS C 2512		E(D1 5	



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY Case No.

Date Filed

CED n & 204E

	3EF U 7 2013			
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY			
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)			
Dallas VAMC & VISN 17	AFGE Local 2437			
4500 S. Lancaster Rd.	PO Box 397960			
Dallas, TX 75216	Dallas, TX 75339			
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)			
Wendell Jones, Jeff Milligan VISN 17 Director & Dallas VAMC Director	Donald Burrell President, AFGE Local 2437			
VISH 17 Director & Danas VAIVIC Director	PO Box 397960			
	Dallas, TX 75339			
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077			
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov			
3. BASIS OF THE CHARGE				
	ged unfair labor practice, including date and location of the particular acts.			
C'				
Since on or about August 24, 2015, and at all times thereafter, the				
Wendell Jones (VISN 17 Director), Jeff Milligan (Director, Dallas V Derrick Gillians (Chief, Respiratory Service) has refused to consul				
	unilaterally changing working conditions and refusing to honor its			
bargaining obligation regarding the change in working conditions				
	,			
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has	violated? (1) • (2) □ (3) □ (4) □ (5) • (6) □ (7) □ (8) □			
c. Have you or anyone else raised this matter in any other procedure	? No□ Yes□ If yes, where?			
	and Conciliation Service			
☐ Equal Employment Opportunity Commission ☐ Merit Systems Prof	· · · · · · · · · · · · · · · · · · ·			
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appe 4. □ DECLARATION	al to FLRA 🔲 Other			
The transfer of the control of the c				
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENT UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE F	į			
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes]				
-	ercial Delivery Certified Mail e-mail (see reverse)			
Donald Burrell	() (/ () 27 August 15			
- Almala	Mirrell (Dr.)			
Type or Print Your Name Y	our Signature Date			

Withdrawn 01/07/16



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST A LABOR ORGANIZATION

FOR FLRA USE ONLY

Case No. DA - 10 - 15 - 047

Date Filed

SEP 2 1 2015

1. CHARGED LABOR ORGANIZATION	2. CHARGING PARTY
a. Name of Charged Labor Organization (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
AFGE LOCAL 2437	George Varghese
4500 S. Lancaster Rd.	239 Hound Hollow
Dallas, TX 75216	Forney, TX 75126
b. Charged Labor Organization Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Donald Burrell, President	George Varghese LVN
4500 S. Lancaster Rd.	239 Hound Hollow
Dallas, TX 75216	forney, TX 75126
tel. 2148570074 fax 2148570077	tel. 4696449403 fax
e-mail Donald.Burrell@va.gov	e-mail George.Varghese2@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the alleg	ed unfair labor practice, including date and location of the particular acts.
Please reference attached letter of correspondence last sent to Mr	. Burrell.
, , , , , , , , , , , , , , , , , , , ,	,
	,
•	·
•	
•	
b. Which subsection(s) of 5 U.S.C. 7116(b) and/or (c) do you believe the Lab	0
	(b)(7) (b)(8) 7116(c)(1) (c)(2) (
c. Have you or anyone else raised this matter in any other procedure?	No □ Yes ® 1f yes, where?
☐ Grievance Procedure ☐ Federal Mediation ar	id Conciliation Service
☐ Equal Employment Opportunity Commission ☐ Merit Systems Protect	
Other Administrative or Judicial Proceeding Negotiability Appeal	to FLRA Other
4. DECLARATION	
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS I	NIT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.
I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUI THIS CHARGE WAS SERVED ON THE DEDSON IDENTIFIED IN BOY 15 BY 1-1-	
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [che In Person In 1st Class Mail In Fax In Commerce	
2 Locality Line Commerce	al Delivery
George Varghese	9/18/15
Type or Print Your Name You	Signature Date

August 18, 2015

Dear Mr. Burrell

It is with more than a fair amount of disappointment that I draft this letter to you.

I have been a dues-paying Union member since I began my career here approximately three years ago. As such, the expectation that If I required assistance the Union would be there for me made me feel supported. That has NOT been the case, however III Hence my disappointment.

In December of 2014 I spoke with Yolanda Connor, Union Steward regarding the 'Unsatisfactory' proficiency given to me by my Nurse Manager, without a meeting or a request for input. I keep a binder of the many letters of appreciation from colleagues and patients alike, as well as continuing education certificates and other information that, in my opinion, is important and relevant to one's proficiency. There were several other LVNs who were also similarly affected, but they chose not to pursue a grievance secondary to my dismal experience with obtaining Union assistance.

It has been more than six months since I filed the grievance. After my initial meet with Ms. Connor I received fewer than three communications from her in as many months, with no forward movement. At that point I contacted her, requesting someone else assist me. Richard Shaw contacted me once, several days later, to state that he had asked my manager to give us three dates we could meet. I then received the second, and last, email communication from him stating that he had a meeting of some sort to attend and would not be able to make the meeting that had been set up.

To date, I have received no further assistance with this from any Union representative, nor has my manager attempted to meet with me,

At the risk of being redundant I again express my deep disappointment regarding what Union dues apparently affords one related to timely assistance.

I tried to cancel my membership many times but the office is closed due to contract negotiations. When I was able to come to the office when open, I was told that I would not be able to cancel until next year. This membership is a very deceiving. During orientation membership was enticing to John with a \$50 incentive to John. Never was It ever mentioned that you're obligated to membership for one year. Furthermore, I find it very disappointed that you cannot even get an appointment to discuss this is situation with Mr. Burrell. This gives me the impression that problems try to be deflected rather than resolved.

lam respectfully requesting immediate cessation of the auto debit of Union dives from my paychecks. I am hoping to hear something by August 27, 2015 where this can be resolved at this local level otherwise I will have no choice but to escalate this to a higher level.

Thanking you in advance for your timely response,

Sincerely,

George Varghese



CHARGE AGAINST AN AGENCY

	FOR FLRA USE ONLY
	Case No. DA-CA-15-0483
ı	Date Filed

CED 2 0 201

	SEP 2 9 2015
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (Include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Dallas VAMC	AFGE Local 2437
4500 S. Lancaster Rd	PO BOX 397960
Dallas, TX 75216	Dallas, TX 75339
(214)857-1166	(214)857-4500
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Jeff Milligan (facility director) & Dr. Wendell Jones (VISN	Donald Burrell
director)	President, AFGE Local 2437
4500 S. Lancaster Rd	PO BOX 397960
Dallas, TX 75216	
tel. (214)857-1166 fax	tel. (214)857-4500 fax
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the a	lleged unfair labor practice, including date and location of the particular acts.
agents, bi. Wender Jones (VISN 17 Director), Jeff Milligan (Dall	ter, the Dallas VAMC & VISN 17, by its supervisors, officials, and/or as VAMC Director), Peter Dancy (Associate Director, Dallas VAMC)
and Ruth Anni Bechaol (Chief, Pharmacy) has refused to consult	t or negotiate in good faith concerning matters affecting washing
conditions with AFGE Local 2437, as exclusive representative, b	by refusing to honor the negotiated official time granted to Dr. Janier
coodwin as a team memper of AFGE Local 2437's negotiation t	Eam for the Local Supplemental Agreement (LSA) Additionally, the
Dates valvic has exhibited bad faith pargaining and repudiated	an agreement (Ground Rules for Negotiations of the LSA) reached
with AFGE Local 2437 on April 10, 2014.	
The Dallas VAMC refusal to honor the Ground Rules for Negotia	ation of the ICA though with the ICA though the ICA
members of its Negotiation team available for contract negotia	tions is an act aimed to discourage and intimidate this Local and Dr.
Jerica Goodwin solely based on her protected activity ans is des	signed to discourage membership within AFGE Local 2/27
-astly, this act represents continually retaliation and reprisal ag	ainst Dr. Jerica Goodwin and Dr. Gerald Goodwin solely based on
their engagement in protected activity, positions, and affiliation	with AFGE Local 2437.
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has	violated? (1) ■ (2) ■ (3) □ (4) □ (5) ■ (6) □ (7) □ (8) □
Have you or anyone else raised this matter in any other procedure	(0) (0)
T	, (3)
I Equal Employment Opportunity Commission 🔲 Merit Systems Pro	and Conciliation Service
Other Administrative or Judicial Proceeding	al to FLRA Other
DECLARATION	
DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENT	'S IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.
MOEKSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE P	PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.
HIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [c	
In Person ☐ 1st Class Mail ☐ Fax ☐ Comme	ercial Delivery 🔲 Certified Mail 🔳 e-mail (see reverse)
Donald Burrell	9/18/2015
Type or Print Your Name	our Signature

Form Exempt Under 44 U.S.C. 3512



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

FOR FLRA USE ONLY				
Case No.	A-CA-16-0017			
	DCT 4 A AAGE			
Date Filed	UU 1 3 71115			

CHARGE AGAINST AN AGENCY	Date Filed OCT 1 3 2015			
Complete instructions are on the back of this form.				
1. Charged Activity or Agency Name: Jeffery L. Milligan, Director Address: Dalias VA Medical Center, 4500 S. Lancaster Rd Dalias, TX 75418 Tel.#: () Ext.	2. Charging Party (Labor Organization or Individual) Name: AFGE Local 2437 Address: Dallas VA Medical Center, 4500 S. Lancaster Rd Dallas. TX 75216 Tel.#: () Ext.			
3. Charged Activity or Agency Contact Information Name: Title: Address: Tel.#: () Ext.	4. Charging Party Contact Information Name: JAMES ALSUP Title: NVAC ATTORNEY Address: 80 F.S. N.W. 2600 / Tel:#: (201) 457-9652 Ext.			
Fax#: ()	Fax#: (202) 379-2928			
5. Which subsection(s) of 5 U.S.C. 7116(a) do you believe have been violate				
6. Tell exactly WHAT the activity (or agency) did. Start with the DATE and LOCATION, state WHO was involved, including titles. On September 11, 2015, the Department of Veterans Affairs, Dallas VA Medical Center completed a personnel action to remove AFGE Local 2437 President, Donald Burrell, from federal employment. The basis of the removal action was for alleged racially derogatory statements made during a protected activity. Despite being informed of the required FLRA analysis for flagrant misconduct, no such analysis was reported in the final removal action. The removal is being grieved and will most likely be the subject of arbitration at a future date. The likelihood that the removal will be supported after arbitration is not high because the FLRA has consistently held that Union representatives acting in representational roles are protected from agency reprisal based on use of abusive language. Specifically, the language at issue in President Burrell's case has been found not to constitute language considered to be flagrant misconduct in Veterans Administration, Washington, DC and VA Medical Center, Cincinnati, OH and AFGE, Local 2301, 26 FLRA 114 (1987). President Burrell remains Local 2437 Local President during the pendency of the removal appeal.				
On September 16, 2015, Director Jeffery L. Milligan signed a memorandum restricting President Burrell's access to the VAMC Dallas campus where Local 2437's main offices are located. The restriction is founded on authority provided in 38 C.F.R. 1,218, which, in essence, gives a Director authority to restrict access to VA facilities. Specifically, 38 C.F.R. 1,218 (a)(5) provides, among other things, for the removal of a person who uses "loud, abusive or otherwise improper language." Director Milligan contends in the Memorandum that since Burrell's removal action found that he used racially derogatory statements, such use provides the reason to restrict his access to Dallas VA facilities. The Director's conclusion is specious because it fails, as did the removal decision, to consider the FLRA requirement that President Burrell's statements must be found to be flagrant misconduct. No such finding has been made. Therefore, the application of the generic and potentially unconstitutional language found in section 1,218 is inappropriate and interferes with President Burrell's ability to properly represent the Bargaining Unit of Local 2437.				
The violation of 5 U.S.C. 7116(a)(2) is articulated in the September 16 Memorandum where it limits Burrell's access to the following: 1. Medical care or treatment; 2. prior notice and reporting to VA Police of the purpose of a visit; 3. mutual prior arrangements to attend to the Local's union activities and representation; 4. a week's notice to management regarding entry onto the Dallas VA campus for purposes of participating in negotiations and limits to the room locations where Burrell can go; and, 5. Burrell can not use language that "could be reasonably construed as harassment, abuse or disrespectful recognized by Equal Employment Opportunity (EEO) laws as being prohibited."				
The Memorandum, in association with statements made by Dallas VAMC managers and actions taken by Dallas VAMC managers makes clear that their long-term intent was to remove President Burrell from his Local President position and thereby damage the ability of Local to properly represent the interests of the Bargaining Unit, all in violation of 5 U.S.C. 7116(a)(2).				
7. Have you or anyone else raised this matter in any other procedure?	No Yes If yes, where? [see reverse]			
8. I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE ST. BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEME 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX. Commercial Delivery Certified Mail	NTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C.			

FLRA Form 22 (Rev. 1/99)

Pending



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST A LABOR ORGANIZATION

4.65		00. 2		
1. CHARGED LAB	OR ORGANIZATION	2. CHARGING PARTY		
a. Name of Charged Labor O	rganization (include address, city, state, & ZIP)	a. Name of Charging Party (include	de address, city, state, & ZIP)	
AFGE Local 2437 4500 South Lancaster I Dallas, TX 75216	Road	Department of Veterans Al 4500 South Lancaster Road Dallas, TX 75216		
b. Charged Labor Organizat	tion Representative (include name, title, address)	b. Charging Party Representative		
Donald Burrell, President, AFGE Local 2437 Gary Martinez, Chief Negotiator, AFGE Local 2437 4500 South Lancaster Road Dalias, TX 75216		Kenneth S. Carroll (on behalf of Donald Kelly, Chief Negotiator, VA North Texas Health Care System, Veterans Integrated System Network 17, VA DFW National Cemetery, VA Consolidated Mail Out Pharmacy, & Veterans Canteen Services) 4500 South Lancaster Road (02), Dallas, Texas 75216		
tel. 214,857-0074	fax	tel. 202 374 9967	fax 214 302 1407	
	donald husrell@va.gov	e-mail K6	enneth.carroll@va.gov	

3. BASIS OF THE CHARGE

Set forth a clear and concise statement of the facts constituting the alleged unfair labor practice, including date and location of the particular acts.

This is filed as an unfair labor practice claim and a breach of settlement (non-compliance). On April 29, 2015, the Union (by Donald Burrell) signed a settlement of ULP DA-CO-15-0010, in which the Union agreed that it would not bargain in bad faith during collective bargaining negotiations over a local supplemental agreement (LSA) with the Agency by, inter alia, (1) refusing or failing to continue negotiations over the LSA, (2) failing to meet for negotiations on the LSA, or (3) suspending negotiations unless mutually agreed. On September 18, 2015, during negotiations for the week of September 14, 2015, Gary Martinez (Martinez) sent an email to Donald Kelly advising that the Union was unilaterally suspending negotiations. See attached. Thereafter, the Union failed to attend scheduled negotiations for that week. On October 13, 2015, Kenneth Carroll (named as the Acting Agency Chief Negotiator for the month of October) sent an email to Martinez, reminding him of the location of negotiations scheduled for the week of October 19, 2015. See attached. Although Martinez read that email on that same day (see attached), he did not respond until Saturday, October 17, 2015, and in that email stated that the Union was unilaterally suspending negotiations indefinitely. See attached. Thereafter, the Union did not appear for negotiations on October 19, 2015. The Union's conduct constitutes an unfair labor practice and a breach of settlement (non-compliance).

b. Which subsection(s) of 5 U.S.C. 7116(b) and/or 7116(b)(1)	(c) do you believe the Labor Organization has violat ☐ (b)(5) ☐ (b)(6) ☐ (b)(7) ☐ (b)(8)	ed? 7116(c)(1) □ (c)(2) □			
c. Have you or anyone else raised this matter in		If yes, where?			
☐ Grievance Procedure ☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding	 ☐ Federal Mediation and Conciliation Service ☐ Merit Systems Protection Board ☐ Negotiability Appeal to FLRA 	☐ Federal Service Impasses Panel ☐ Office of Special Counsel ☐ Other			
4. DECLARATION					
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNKHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b by Icheck all appropriate bokes)					
l control of the cont		tified Mail 🔳 e-mail (see reverse)			
Kenneth S. Carroll	MARIC	October 19, 2015			
Type or Print Your Name	l Wour Signature (, Date			



CHARGE AGAINST AN AGENCY

			FOR	FLRA	ONLY	
		********	 		 	-
~~	6 Lm	·				

FOR FLIRA USE ONLY
DA - CA - 16-004

Date Filed

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
Department of Veteran Affairs (Attn: Robert McDonald) 810 Vermont Ave NW Washing 20420	AFGE Local 2437 PO Box 397960 Dallas, TX 75339-7960
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Secretary Robert McDonald	Donald Burrell
Department of Veteran Affairs	AFGE Local 2437
810 Vermont Ave NW	PO Box 397960
Washing 20420	Dallas, TX 75339-7960
tel. (202) 461-4809 fax	tei. (214)857-4500 fax (214)857-0077
e-mail bob.mcdonald@va.gov	
	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and concise statement of the facts constituting the	alleged unfair labor practice, including date and location of the particular acts.
(Associate Director, Dallas VAMC), and Ruth Ann Bechdol (Chiconcerning matters affecting working conditions with AFGE Lobargaining obligations and unilaterally implementing new per-Anticoag Technician -Anticoag Pharmacist -Chronic Pain/CARF Pharmacist -Heme/One Pharmacist -Geriatrics/HBPC Pt-Inpt Clinical/Acute Care Pharmacist -Surgical (ICU/OR) Infections Disease Pharmacist -Hep C Pharmacist -Clinical Pharmacists -Ambulatory Care Pharmacist -Secretary -ADPAC/Data Manager -Pharmacoeconomics Specialist, Program Manager -Automation Technician -Office Automation	ist acist harmacist Pharmacist ACT Pharmacists cs Pharmacist Assistant
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency h	as violated? (1) (2) (3) (4) (5) (6) (7) (8) (8)
c. Have you or anyone else raised this matter in any other procedu	··· ,, ····+,
☐ Grievance Procedure ☐ Federal Mediation ☐ Equal Employment Opportunity Commission ☐ Merit Systems P	on and Conciliation Service
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Ap	
4. DECLARATION	
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEME I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BI THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY In Person In 1st Class Mail In Fax In Com	E PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.
Donald Burrell	10/21/2015
Type or Print Your Name	Your Signature Date



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY CHARGE AGAINST AN AGENCY

	FOR FLRA USE ONLY		
	Case No. DA - CA - 16 - 0119		
-	Date Filed		

donald.burrell@va.gov

JAN I I ZUIO AGENCY AGAINST WHICH CHARGE IS BROUGHT **CHARGING PARTY** a. Name of Charged Agency (include address, city, state, & ZIP) a. Name of Charging Party (include address, city, state, & ZIP) Dallas VAMC & VISN 17 AFGE Local 2437 4500 S. Lancaster Rd. POBOX 397960 Dallas, TX 75216 Dallas, TX 75339 b. Agency Representative (include name, title, address) b. Charging Party Representative (include name, title, address) Wendell Jones, Jeff Milligan Donald Burrell VISN 17 Network Director & Dallas VAMC Director President, AFGE Local 2437 PO B OX 397960 Dallas, TX 75339 tel. (214)857-1166 tel. (214)857-4500 fax (214)857-0077 e-mail jeffery.milligan@va.gov

3. BASIS OF THE CHARGE

Set forth a clear and concise statement of the facts constituting the alleged unfair labor practice, including date and location of the particular acts.

Since on or about October 27, 2015, and at all times thereafter, VISN 17 and the Dallas VAMC, by its supervisors officials and/or agents Dr. Wendell Jones (VISN 17 Director), Dr. Jeff Hastings (Chief of Staff), and Jeff Milligan (Director, Dallas VAMC) has failed to provide the exclusive representative with data requested bye the union regarding performance pay for employees (MDs) in 2013-2014 and performance pay criteria for 2012-2014 at the Dallas VAMC thereby in violation of 7114(b)(4).

b. Which subsection(s) of 5 U.S.C. 7116(a) do yo	u believe the Agency has violated? (1) 值 (2) 디	(3) 🗆 (4) 🗗 (5) 🖻 (6) 🗗 (7) 🗆 (8) 🗎		
 c. Have you or anyone else raised this matter ☐ Grievance Procedure ☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding 	☐ Federal Mediation and Conciliation Service ☐ Merit Systems Protection Board	If yes, where? ☐ Federal Service Impasses Panel ☐ Office of Special Counsel ☐ Other		
4. DECLARATION				
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [check all appropriate boxes] In Person In 1st Class Mail Fax Commercial Delivery Certified Mail e-mail (see reverse)				
Donald Burrell	Donald Boursell (as)	12/28/2015		
Type or Print Your Name	Your Signature	Date		
Form Exempt Under 44 U.S.C. 3512		F: 0.4 5 22 /0 40 /2044)		



FOR	FLRA	USE	ONL

CHARGE AGAINST AN AGENCY	Date Filed FEB 2 9 2016
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) VISN 17 & Dallas VAMC 4500 S. Lancaster Rd. Dallas, TX 75216 (214)857-1166	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PO BOX 397960 Dallas, TX 75339 (214)857-0074
b. Agency Representative (include name, title, address) Joseph Dalpiaz & Jeff Milligan & VISN 17 Network Director & Dallas VAMC Director	b. Charging Party Representative (include name, title, address) Donald Burrell President, AFGE Local 2437
4500 S. Lancaster Rd. Dallas, TX 75216	PO Box 397960 Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
Since on or about February 19, 2016, and at all times thereafter, Dalpiaz (VISN 17 Director) and Jeff Milligan (Director, Dallas VAM	C) has refused to consult or negotiate in good faith concerning clusive representative, by unilaterally changing working conditions is in Building Access" and refusing to meet at a mutual time and
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has v	iolated? (1) 回 (2) 口 (3) 口 (4) 口 (5) 回 (6) 口 (7) 口 (8) 回
c. Have you or anyone else raised:this:matter.in.any other procedure? Grievance Procedure Equal Employment Opportunity/Commission Herit Systems Protection Other Administrative or Judicial Proceeding	ection Board
4. DECLARATION	
Donal	UNISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001. Heck all appropriate boxes] Hocial Delivery □ Certified Mail □ e-mail (see reverse)
Donald Burrell	2/24/16
Type or Print Your Name Yo	ur Signature Date

Pending



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

FOR FLRA USE ONLY

Case No. DA-CA-16-0212

Date Filed FFR 2 0 7016

1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
VISN 17 & Dallás VAMC	AFGE Local 2437
4500 S. Lancaster Rd.	PO BOX 397960
Dallas, TX 75216	Dallas, TX 75339
(214)857-1166	(214)857-0074
b. Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Joseph Dalpiaz & Jeff Milligan	Donald Burrell
VISN 17 Network Director & Dallas VAMC Director	President, AFGE Local 2437
4500 S. Lancaster Rd.	PO Box 397960
Dallas, TX 75216	Dallas, TX 75339
W. (200)057 44 60	
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
3. BASIS OF THE CHARGE	
a. Set forth a clear and comcise statement of the facts constituting the alleg	ged unfair labor practice, including date and location of the particular acts.
Since on or about December 29, 2015, and at all times thereafter, Dalpiaz (VISN 17 Director), Jeff Milligan (Director, Dallas VAMC), consult or negotiate in good faith concerning matters affecting with representative, by unilaterally changing working conditions of Ms Additionally, the Dallas VAMC has engaged in acts and conduct in into an agreement with said employee, which were designed to under the content of the content	and Derrick Gillians (Chief, Respiratory Service) has refused to orking conditions with AFGE Local 2437, as exclusive . Faylene Byrd without fulfilling its bargaining obligation. volving bypassing the Union and directly negotiating and entering
b. Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has vi	
c. Have you or anyone else raised this matter in any other procedure?	No ■ Yes □ If yes, where?
☐ Grievance Procedure ☐ Federal Mediation a ☐ Equal Employment Opportunity Commission ☐ Merit Systems Prote	
☐ Other Administrative or Judicial Proceeding ☐ Negotiability Appeal	
4. DECLARATION	
I DECLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMENTS I UNDERSTAND THAT MAKING WILLFULLY FALSE STATEMENTS CAN BE PUTULE SHAPE OF MAKING WILLFULLY FALSE STATEMENTS.	NISHED BY FINE AND IMPRISONMENT, 18 U.S.C. 1001.
THIS CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY [ch☐ In Person☐ 1st Class Mail☐ Fax☐ Commer	
☐ In Person ☐ 1st Class Mail ☐ Fax ☐ Commer	cial Delivery
Donald Burrell Donald	2/24/16
Type or Print Your Name You	ur Signature Date

Pending



UNITED STATES OF AMERICA FEDERAL LABOR RELATIONS AUTHORITY

CHARGE AGAINST AN AGENCY

	FOR FLRA	USE ONLY	
Case No.	4-CA-	1 i – i	3
Date Filed			

0 5 6	FEB 2 9 2016
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
VISN 17 & Dallas VAMC 4500 S. Lancaster Rd. Dallas, TX 75216 (214)857-1166	AFGE Local 2437 PO B OX 397960 Dallas, TX 75339 (214)857-0074
Agency Representative (include name, title, address)	b. Charging Party Representative (include name, title, address)
Joseph Dalpiaz & Jeff Milligan VISN 17 Network Director & Dallas VAMC Director 4500 S. Lancaster Rd. Dallas, TX 75216	Donald Burrell President, AFGE Local 2437 PO Box 397960 Dallas, TX 75339
el. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov

3. BASIS OF THE CHARGE

a. Set forth a clear and concise statement of the facts constituting the alleged unfair labor practice, including date and location of the particular acts.

Since on or about December 29, 2015, and at all times thereafter, the Dallas VAMC, by its supervisor, official, and/or agent, Joseph Dalpiaz (VISN 17 Director) and Jeff Milligan (Director, Dallas VAMC) has refused to consult or negotiate in good faith concerning matters affecting working conditions with AFGE Local 2437, as exclusive representative, by refusing to meet at a mutual date & time and confer in good faith regarding the Demand to Bargain filed regarding criteria used for the performance awards for physicians.

	•	
b. Which subsection(s) of 5 U.S.C. 7116(a) do yo	u believe the Agency has violated? (1) 图 (2) 디 (3) 디	(4)口(5)回(6)口(7)口(8)回
c. Have you or anyone else raised this matter	in any other procedure? No M Yes 🗆 If yes,	where?
☐ Grievance Procedure ☐ Equal Employment Opportunity Commission ☐ Other Administrative or Judicial Proceeding		al Service Impasses Panel of Special Counsel
4. DECLARATION		
I UNDERSTAND THAT MAKING WILLFULLY FALSE	THAT THE STATEMENTS IN IT ARE TRUE TO THE BEST OF MY STATEMENTS CAN BE PUNISHED BY FINE AND IMPRISONME	KNOWLEDGE AND BELIEF. NT, 18 U.S.C. 1001.
THIS CHARGE WAS SERVED ON THE PERSON IDE	NTIFIED IN BOX 1b BY [check all appropriate boxes]	
☐ In Person ☐ 1st Class Mail ☐	Fax Commercial Delivery Certified Mail	☐ e-mail (see reverse)
Donald Burrell		2/24/16
Type or Print Your Name	Your Signature	Date



	FOR FLRA USE ONLY
Case No.	DA-CA-16-0214
Data Cila	1

CHARGE AGAINST AN AGE	2NOV 200-10-044
	ENCY Pate Filed FEB 2 9 2016
1. AGENCY AGAINST WHICH CHARGE IS BROUGHT	2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP)	a. Name of Charging Party (include address, city, state, & ZIP)
VISN 17 & Dallas VAMC	AFGE Local 2437
4500 S. Lancaster Rd.	PO BOX 397960
Dallas, TX 75216	Dallas, TX 75339
(214)857-1166	(214)857-0074
. "	(447)03/-00/4
b. Agency Representative (include name, title, address)	h Classic Date D
Joseph Dalpiaz & Jeff Milligan	b. Charging Party Representative (include name, title, address)
VISN 17 Network Director & Dallas VAMC Director	Donald Burrell
4500 S. Lancaster Rd.	President, AFGE Local 2437
Dallas, TX 75216	PO Box 397960
Dunus, 17 /3216	Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	e-mail donald.burrell@va.gov
BASIS OF THE CHARGE	
Set forth a clear and concise statement of the facts are the facts	e alleged unfair labor practice, including date and location of the particular acts.
Pallas VAMC.	Natura
	t e
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency h	nas violated? (1) 回 (2) 口 (3) 口 (4) 口 (5) 回 (6) 口 (7) 口 (8) 回
Have you or anyone else raised this matter in any other procedu	are? No ■ Yes □ If yes, where?
Grievance Procedure □ Federal Mediati	on and Conciliation Service
Equal Employment Opportunity Commission	rotection Board Office of Special Councel
Other Administrative or Judicial Proceeding	peal to FLRA ☐ Other
DECLARATION	
CLARE THAT I HAVE READ THIS CHARGE AND THAT THE STATEMEN	NTS IN IT ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.
- THE WORLD WILL OFFI LYPP STATEMENTS CAN RE	E PUNISHED BY FINE AND IMPRISONMENT 1011 C 2004
CHARGE WAS SERVED ON THE PERSON IDENTIFIED IN BOX 1b BY	'[check attappropriate boxes]
	mercial Delivery Certified Mail e-mail (see reverse)
Donald Burrell	s 10 10 10 10 10 10 10 10 10 10 10 10 10
	2/24/16
Type or Print Your Name	Your Signature Date



•		FOR FLRA USE ONLY	7
į	Case No. DA	-CA-16-	0223
Ī	Date Filed:		

AGENCY AGAINST WHICH CHARGE IS BROUGHT	MAR - 8 2016 2. CHARGING PARTY
a. Name of Charged Agency (include address, city, state, & ZIP) VISN 17 & Dallas VAMC 4500 S. Lancaster Rd. Dallas, TX 75216 (214)857-1166	a. Name of Charging Party (include address, city, state, & ZIP) AFGE Local 2437 PG BOX 397960 Dallas, TX:75339 (214)857-0074
b. Agency Representative (include name, title, address)	
Joseph Dalpiaz & Jeff Milligan VISN 17 Network Director & Dallas VAMC Director 4500 S. Lancaster Rd. Dallas, TX 75216	b. Charging Party Representative (include name; title, address) Donald Burrell President; AFGE Local 2487 PO Box 397960 Dallas, TX 75339
tel. (214)857-1166 fax	tel. (214)857-4500 fax (214)857-0077
e-mail jeffery.milligan@va.gov	(===/05/-00//
3. BASIS OF THE CHARGE	e-mail. 120 4 donald.burrell@va.gov
Which subsection(s) of 5 U.S.C. 7116(a) do you believe the Agency has viol	ited? (1) 回 (2) 口 (3) 口 (4) 口 (5) 回 (6) 口 (7) 口 (8) 回
Have you or anyone else raised this matter in any other procedure? Grievance Procedure Equal Employment Opportunity Commission Other Administrative or Judicial Proceeding I Negotiability Appeal to	No Yes If yes; where? Conciliation Service, D. Federal Service Impasses Panel D. Office of Special Counsel
Have you or anyone else raised this matter in any other procedure? Grievance Procedure ***D Federal Mediation and	No ■ Yes □ If yes; where? Conciliation Service. □ Federal Service Impasses Panel □ Office of Special Counsel FLRA □ Other

Your Signature:

Type or Print Your Name